Around a Common Table

Advancing Community-Based SNAP Outreach for Latino Households in Arizona

C. Marie Lawrence

2011

PREPARED FOR
ARIZONA COMMUNITY ACTION ASSOCIATION

Arizona Community Action Association

The Arizona Community Action Association (ACAA) is a 501(c)(3) mission-driven association created in 1967 to address poverty across Arizona by uniting communities to end poverty through community-based initiatives and solutions. Through a collaboration of 300 organizations and individuals, ACAA develops and implements strategies to address and ultimately eliminate poverty.

ACAA promotes self-sufficiency by working with Community Action Agencies statewide to provide the tools needed to become self sufficient. Our members' services include case management and emergency assistance for food, utilities, rent and eviction prevention, emergency shelter, financial assistance, resources, referrals and employment.

Find out more at www.azcaa.org or by calling (602) 604-0640.

Author Contact

Marie Lawrence, Bill Emerson National Hunger Fellow

mlawrence@hungercenter.org

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In addition, I want to express my sincerest appreciation and respect for the project's interviewees, whose contributions are synthesized in the barriers and recommendations sections of this report. I hope this piece of writing is an accurate reflection of the assets and opportunities in your communities and, in some small way, supports your admirable work standing with, serving, and advocating for marginalized groups in Arizona. This project draws on interviews with representatives from the following thirty organizations:

Arizona Bridge to Independent Living
Arizona First Things First
Asian Pacific Community in Action
Border Action Network
Cartwright Family Resource Center
Catholic Charities
Chicanos Por La Causa
Childhelp
Children's Action Alliance
Citizens to End Poverty
Community Food Bank
Community Legal Services
Golden Gate Community Center
Hernandez Lechner PLLC
Kingdom Communities of the Valley
La Frontera Arizona
My Sister My Friend
Neighborhood Ministries
New City Phoenix/Barrio Nuevo
Roman Catholic Diocese of Phoenix
Safety, Nutrition, Activity and Care for Kids
St. Luke's Health Initiative
St. Mary's Food Bank
Somos America/Respeto
Stand for Children
United Way of Tucson and Southern Arizona
Valle del Sol, Inc.
Valley Interfaith Project
Valley of the Sun YMCA
Wesley Community Center

Meanings of Frequently Used Terms

application assistor | a volunteer or employee of community-based application site (see "community-based application site" below) who helps clients complete a SNAP application
community-based application site | a community-based organization that provides interested clients with a paper SNAP application or access to the online SNAP application and the help of an application assistor
food insecurity | a household-level economic and social condition of limited or uncertain access to adequate food
high opportunity area | a distinction for a geographic area in which the SNAP participation gap (see "SNAP participation gap" below) or SNAP non-participation rate (see "SNAP non-participation rate" below) is large relative to the participation gaps or non-participation rates in other geographic areas in the state
Latino likely-eligible (LLE) | a distinction for a Latino individual (see note on "Latino" below) who is estimated to meet basic SNAP eligibility requirements based on income, resources, and citizenship status; when used in quantitative analysis in this report, Latino likely-eligible refers to an individual who is likely eligible for SNAP based on the gross income limit alone
mixed-status household | a family or household (see note on "family" and "household" below) that includes one or more members who are citizens and/or legal US residents and one or more members who are not legal US residents
poverty | a condition in which the income of an individual or combined income of a group of individuals falls below the Federal Poverty Level
promotora | an outreach worker in a Latino community who is responsible for raising awareness of health and educational issues
SNAP applicant household | the individual or group of individuals for whom a SNAP applicant is applying; the SNAP applicant household does not necessarily include the person completing the application
SNAP participation gap | the number of individuals likely eligible for SNAP less the number of individuals in the same population enrolled in SNAP
SNAP non-participation rate | the SNAP participation gap divided by the number of individuals likely eligible for SNAP, representing the ratio of likely eligible people not enrolled in SNAP
undocumented | the condition of not possessing state-issued papers to prove legal US residency

This report uses the terms "family" and "household" interchangeably, recognizing that some individuals and groups of individuals to whom these terms refer may prefer one term over the other.

The term "Latino" is used throughout this report to refer to Latino or Hispanic persons of Mexican, Puerto Rican, Cuban, Central and South American, Dominican, Spanish, and other Latino descent; they may be of any race.

Meanings of Frequently Used Acronyms

ACAA	Arizona Community Action Association
CBO	Community-based Organization
DES	Department of Economic Security
FPL	Federal Poverty Level
HB	House Bill
ICE	Immigrations and Customs Enforcement
LEP	Limited English Proficient
LLE	Latino Likely-Eligible (person)
NEP	Non English Proficient
PSA	Public Service Announcement
SB	Senate Bill
SNAP	Supplemental Nutrition Assistance Program
USDA	United States Department of Agriculture
WIC	Special Supplemental Program for Women, Infants and Children

EXECUTIVE SUMMARY

Latino residents of Arizona experience disproportionately high poverty and food insecurity rates compared to non-Latino residents, and Latino poverty and food insecurity rates have been increasing more quickly than rates for non-Latino residents since the beginning of the most recent economic recession. At the same time, statewide Latino enrollment in the Supplemental Nutrition Assistance Program (SNAP, formerly known as the Food Stamp Program) has been declining relative to non-Latino enrollment and declining in absolute terms since December 2009. SNAP provides various benefits to recipient households, including reduced levels of food insecurity and improved educational, health and economic outcomes. In addition, SNAP dollars multiply in the economy and support local economic growth.

Responding to the contradictory trends of increasing Latino poverty and declining Latino SNAP enrollment, Arizona Community Action Association (ACAA) commissioned this report to inform improvements in SNAP outreach to Latino households in Arizona. The author employed quantitative and qualitative methods to investigate barriers to SNAP participation by Latino households in Arizona, identify neighborhoods with high opportunity for SNAP outreach impact, recommend changes to the current outreach model and content, and create tools for evaluating progress toward outreach goals over time.

Latino likely-eligible (LLE) people in Arizona face myriad barriers to SNAP participation. Interviews with service providers and advocates from 30 community-based organizations in Arizona revealed that Latino families are under-enrolled in SNAP because some LLEs:

- Do not recognize the new federal and state names for SNAP
- Do not realize they are eligible
- Do not know how to begin the process to access benefits for the first time
- Fear reporting and deportation of undocumented family members
- Fear that applying will affect the future legalization process for undocumented family members
- Perceive benefit levels to be too low to justify applying
- Feel pride in being able to support their families without assistance and are concerned that their use of the program will diminish resources available for others with greater need
- Experience difficulty accessing and/or do not like to apply for services in Department of Economic Security (DES) offices
- Feel uncomfortable interacting with DES personnel
- Face various issues applying on their own
- Face language-related barriers to understanding SNAP outreach materials
- Cannot apply at community-based sites because they are under-resourced
- Fail to respond to DES notifications
- Do not appeal their cases when they feel they have been wrongfully denied or their benefits have been wrongfully reduced

A geographic analysis of LLE SNAP participation in Arizona revealed that participation rates vary significantly by county and ZIP code. Analysis of American Community Survey 5-year estimates of Latino poverty and DES SNAP enrollment data reveal that Maricopa and Pima Counties have the highest opportunity for increasing absolute LLE SNAP enrollment, with an estimated 121,086 and 17,607 LLE individuals not enrolled, respectively. Apache and Greenlee Counties have the highest Latino SNAP non-participation rates, with an estimated 48.8% and 48.2% of LLEs not enrolled in SNAP, respectively. The five ZIP codes with the highest absolute numbers of LLEs not enrolled are 85706 (Pima), 85264 (Yuma), 85705 (Pima), 85008 (Maricopa), and 85222 (Pinal). The five ZIP codes

with the highest LLE SNAP non-participation rates and with participation gaps of at least 100 are 85236 (Maricopa), 85228 (Pinal), 85237 (Pinal), 85222 (Pinal), and 85219 (Pinal). In general, ZIP codes with higher absolute participation gaps are urban, with more resources available to low-income people but much higher LLE populations; ZIP codes with high non-participation rates are generally rural, with lower LLE populations and much lower access to resources for low-income people.

Responding to the above barriers and the uneven geographic distribution of Latino SNAP under-enrollment, this report recommends a series of chronological steps to improve SNAP outreach for LLEs in Arizona. Major recommendations include: (1) create a coalition of representatives from Latino-serving organizations across Arizona to guide ongoing outreach improvement; (2) provide outreach materials that directly address the barriers and misconceptions listed above; (3) use community-tested methods for communicating the information to Latino likely eligible people; and (4) plan for the sustainability of the coalition by applying for non-governmental funding sources and committing to regular re-evaluation of coalition progress, goals, and activities.

I. INTRODUCTION

Latino individuals in Arizona are disproportionately poor and food insecure and, at the same time, are under-enrolled in the Supplemental Nutrition Assistance Program (SNAP), a federal program designed to help families put healthy food on the table. In recent years, the poverty and food insecurity rates have increased for Latino individuals in Arizona as they were hit with both an economic recession that disproportionately affected low-wage workers, and immigration-related legislation aimed at "attrition by enforcement."[1] During the same period, Latino enrollment in SNAP declined.

Arizona Community Action Association (ACAA), the long-time recipient of the outreach portion of the SNAP Information and Access Plan grant from the US Department of Agriculture (USDA), seeks to improve SNAP outreach to Latino individuals in Arizona to support self-sufficiency and well-being among Latino households across the state. To develop a plan for improving outreach to Latino likely-eligible (LLE) individuals in Arizona, ACAA commissioned an Emerson National Hunger Fellow to undertake a project with the following major activities:

1. Identify barriers to SNAP participation by Latino households.
2. Identify the number and location of LLE people not participating in SNAP.
3. Formulate actionable recommendations to improve outreach efforts as informed by barriers to participation.
4. Create tools and methods for re-evaluating barriers, recalculating participation gaps by geography, and amending outreach materials on an ongoing basis.

The Fellow employed a mixed-methods approach to achieving the project goals, recognizing that the best sources of information on barriers and recommendations for outreach to LLE audiences are Latino likely eligible people themselves and service providers who work closely with LLEs. First, the Fellow contacted and interviewed representatives from 30 Arizona-based organizations involved in direct service to or advocacy on behalf of low-income Latino households. The goals of these interviews were to (1) discuss Latino-specific barriers to SNAP participation, (2) gather best practices in program outreach to Latino families, and (3) seed relationships with Latino-serving organizations and gauge their interest in serving on a SNAP outreach coalition. In addition, the fellow attended an ACAA SNAP outreach presentation in Nogales, AZ, and talked with LLEs at an Arizona Department of Economic Security (DES) office in South Phoenix. The Fellow supplemented interview data with research from other states on best practices in SNAP outreach to LLEs. To complement the qualitative data, the Fellow examined Latino SNAP enrollment numbers from Arizona, Nevada and New Mexico and compared Arizona Latino SNAP enrollment data from DES to LLE SNAP eligibility numbers derived from 5-year American Community Survey estimates for all Arizona counties and ZIP codes.

The findings from this research are presented in the following report in four parts. Section II explores the background on hunger, food insecurity, and low SNAP enrollment among Latino individuals in Arizona. Section III synthesizes the barriers to LLE SNAP participation as revealed through conversations with representatives from 30 Arizona-based organizations, including service providers and advocates. Section IV analyzes the geographic distribution of LLE SNAP under-enrollment and presents the Arizona counties and ZIP codes with the highest opportunity for SNAP outreach impact. Finally, section V presents recommendations for advancing community-based SNAP outreach for Latino households in Arizona, focusing on the creation of a SNAP outreach coalition of Latino-serving organizations.

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[1] *The Support our Law Enforcement and Safe Neighborhoods Act of 2010,* SB 1070. 49th Arizona Legis., 2nd sess.

II. BACKGROUND

A. Latino Poverty and Food Insecurity in Arizona

Latino households experience consistently higher poverty than non-Latino households. In 2009, 23.5% of Latino individuals in the US were poor, compared to 14.3% of all persons in the US.[2] The same ethnic poverty gap exists in Arizona, where, in 2009, 26.2% of Latino residents of Arizona experienced poverty, compared to 16.5% of all state residents.[3] The poverty gap in Arizona has widened since December 2007, the official start of the Great Recession, demonstrating the disproportionate effects of the economic downturn on Latino families. Between 2007 and 2009, poverty among Latino Arizona residents increased by 19.1%, while poverty among all Arizona residents increased by only 16.2%.[4,5]

Latino households also experience higher rates of food insecurity than non-Latino households. In 2009, 26.9% of Latino US residents experienced food insecurity, compared to 14.7% of all US residents.[6] Feeding America, the nation's largest distributor of emergency food, conducted a national survey to determine the characteristics of clients using Feeding America-supported emergency food programs in 2009. Of the clients using emergency food programs in Arizona, 51% were Latino.[7] In contrast, Latino individuals made up only 30.8% of the total population in Arizona in 2009.[8] These facts suggest that Latino families in Arizona have more difficulty than other racial/ethnic groups accessing enough nutritious food for an active, healthy life.

Children are an important subpopulation of Arizona's Latino residents to consider in any discussion of poverty and hunger, as children experience high rates of poverty and food insecurity. In 2009, 32.8% of Latino children in Arizona were living below the federal poverty level (FPL), compared to 23.0% of all children in Arizona.[9] Arizona's children face higher food insecurity rates than the country as a whole. According to a 2010 Feeding America report analyzing data collected from 2006-2008, 24.2% of children in Arizona were food insecure, which was the third highest child food insecurity rate in the US. Nationwide, 18.9% of children were food insecure.[10]

Many Latino children in Arizona are children of immigrants, an especially vulnerable population. According to Children's Action Alliance, which advocates for children's rights at the Arizona state legislature:

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[2] U.S. Bureau of the Census, *2009 American Community Survey*, http://www.factfinder.census.gov/servlet/DatasetMainPageServlet?_program=ACS&_submenuId=&_lang=en&_ts= (accessed December 1, 2010).
[3] Ibid.
[4] Ibid.
[5] U.S. Bureau of the Census, *2007 American Community Survey*, http://www.factfinder.census.gov/servlet/DatasetMainPageServlet?_program=ACS&_submenuId=&_lang=en&_ts= (accessed December 1, 2010).
[6] U.S. Department of Agriculture, Economic Research Service, *Household Food Insecurity in the United States, 2009* (Washington, DC, 2010), http://www.ers.usda.gov/Publications/ERR108/ERR108.pdf (accessed December 1, 2010).
[7] Mathematica Policy Research Institute, *Hunger in America: Arizona (9904) State Report* (2010), http://www.azfoodbanks.org/images/uploads/AZ9904%20lo%20res.pdf (accessed February 1, 2011).
[8] U.S. Bureau of the Census, *2009 American Community Survey*.
[9] Ibid.
[10] Feeding America, *Child Food Insecurity in the United States: 2006-2008* (2010), http://www.azfoodbanks.org/images/uploads/AZ9904%20lo%20res.pdf (accessed February 1, 2011).

> "Children of immigrants are the fastest growing component of the child population in our nation. Children of immigrants make up 20 percent of all U.S. kids, and 25 percent of Arizona's children. Ninety-three percent of children of immigrants under the age of 6 are U.S. citizens, yet many challenges remain, including English language acquisition and economic disparities. Any discussion of Arizona's future would be incomplete without understanding the impact of children of immigrants."[11]

As would be the case for any racial/ethnic group, the poverty and hunger experienced by Latino families in Arizona negatively affect the well-being of Latino families, the productivity of the Latino labor force, consumption and full economic participation by Latino households, the health of Latino individuals, and the educational attainment of Latino children in Arizona, among other negative impacts. Together, these effects form a convincing foundation for targeted hunger alleviation among Latino households in Arizona.

B. Arizona HB 2008 and SB 1070 and Latino Participation in Public Programs

Recent state legislation affecting immigrants in Arizona has emerged at the forefront of state and federal debates on immigration law and immigrants' rights. In particular, Arizona House Bill 2008 (HB 2008) and Arizona Senate Bill 1070 (SB 1070) have had significant negative impacts on Latino participation in public benefit programs.

HB 2008 was signed into law by Governor Jan Brewer and went into effect on November 24, 2009. The bill includes two sections with important ramifications for (1) "employee[s] of an agency of this state or a political subdivision of this state" who administer federal, state, or local public benefits subject to residency and/or citizenship requirements, and (2) applicants for federal, state, and local public benefits. The law stipulates that applicants for federal, state, and local benefit programs must present at least one qualifying form of identification to prove legal residency and/or citizenship and sign a sworn affidavit attesting to the authenticity of the documents. In addition, the law established criminal penalties for state employees who do not report violations. Specifically, failure by agency employees to report a "discovered violation" to immigration authorities became a class 2 misdemeanor. To make a "discovered violation" under HB 2008, agency employees must learn that the benefits applicant is residing in the US illegally; the fact that an applicant is not a citizen or does not have documents to prove citizenship are insufficient to substantiate a report to immigration authorities. Employee supervisors who become aware of any failures to report and "[fail] to direct the employee to report" are also guilty of a class 2 misdemeanor. Moreover, any resident of Arizona can bring a suit to "remedy any violation of this section [of the law]."[12]

Following the passage of HB 2008, citizens and qualifying legal US residents remain eligible for SNAP even if they live with people residing in the US illegally. In many cases, these households are mixed status families that include eligible US citizen children. Persons residing in the US illegally are still able to apply for their legally residing, eligible family members. HB 2008 does not restrict that right; the law makes it a state crime for government workers who make a discovered violation of that person's illegal residency to fail to report the person to US immigration authorities.

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[11] Children's Action Alliance, "Children and Immigration", http://www.azchildren.org/display.asp?pageId=49&parentId=9 (accessed February 1, 2011).
[12] *General Government; Budget* Reconciliation, HB 2008. 49th Arizona Legis., 3rd special sess.

HB 2008 has had significant negative impacts on enrollment in several public benefit programs. Analysis of public information on enrollment in public benefit programs administered by DES reveal that enrollment in several programs declined following HB 2008:

- The number of children receiving Temporary Assistance for Needy Families fell 18.2% from December 2009 to June 2010, after which state regulations reduced benefits.
- The number of persons who received Medical Assistance through Arizona Health Care Cost Containment System (AHCCCS) saw a dip following HB 2008, while enrollment had been increasing before December 2009 and increased after April 2010, the lowest point in the dip in enrollment. Enrollment fell by 5,642 individuals between December 2009 and April 2010.
- The number of people receiving Federal Emergency Services, which are not subject to legal residency requirements, fell 29.7% from December 2009 to July 2010.

It is reasonable to assume that some of the decline in enrollment immediately following the passage of HB 2008 was precipitated by a lack of understanding of the bill's provisions on the part of benefits applicants and agency employees alike. These misunderstandings and misapplications resulted in a large number of reports of undocumented people to Immigration and Customs Enforcement (ICE). Two public records requests from DES show that most reports to ICE occurred in the first two months after the bill was passed. From November 24, 2009 until Jan 29, 2010, DES made 864 reports of discovered violations to ICE, followed by just 124 reports in the seven months that followed. Stories and experiences of reporting and deportation circulated widely among households with undocumented members, and benefit program enrollment numbers dropped as mixed-status households became increasingly afraid to enter DES offices and apply for DES-administered benefits.

Though it less directly affected public benefit programs, SB 1070 contributed further to the creation of an unwelcoming environment for undocumented immigrants and members of mixed status households in Arizona. SB 2010 was introduced in the state legislature in January 2010 and signed into law by Governor Jan Brewer on April 23, 2010. In general, the law was intended to increase the authority of local police to stop, question, and detain undocumented immigrants. The law was set to go into effect on July 29, 2010, but a federal injunction indefinitely blocked some provisions of the law. Among the provisions that were allowed to go into effect in 2010 are provisions that:

- "…[Make] it a state crime for day laborers to be picked up for work on a sidewalk, street, or highway, if a vehicle is impeding the flow of traffic."
- "…[Make] it a state crime for any person who is already breaking a criminal law to also transport or harbor any undocumented immigrant if the person is helping them stay in the country illegally or hide from immigration officials."
- "…[Allow] government entities to maintain and share information about your immigration status with other government entities, including federal immigration officials."[13]

News sources report that SB 1070 has contributed to an increasingly hostile environment for Latino families in Arizona. Immediately after SB 1070 was passed, the New York Times quoted a representative from the Mexican American Legal Defense and Educational Fund who feared that SB 1070 would create a "spiral of pervasive fear, community distrust, increased crime and costly litigation, and nationwide repercussions."[14] Indeed, some of these issues have materialized. The Fellow interviewed several service providers for this project who reported that members of mixed status families have been afraid to be in public or to drive because they fear being stopped or pulled over by police and asked for documents, an action made lawful under SB 1070 but ultimately

[13] American Civil Liberties Union of Arizona, "An Update on SB 1070: Know Your Rights!" (2010).
[14] Randal Archibold, "Arizona Enact Stringent Law on Immigration," *New York Times* (April 23, 2010), http://www.nytimes.com/2010/04/24/us/politics/24immig.html?_r=4 (accessed February 1, 2011).

prevented by the federal injunction. Parents are also afraid to send their children to school. An article published by American Public Media after the bill passed but before it went into effect in July 2010 states: "'In the last five weeks, we're down about almost 100 students,' said Jeffrey Smith, superintendent of the Balsz Elementary School District."[15] For many families, relocating is preferable to living in Arizona after SB 1070. A study based on US Census data conducted by financial firm BBVA Bancomer estimated that approximately 100,000 Latino individuals had left Arizona by November 2010.[16]

C. Latino Enrollment in SNAP in Arizona

SNAP, formerly known as the Food Stamp Program, is a federal program funded by the USDA and administered by DES. The purpose of the program is to supplement household income for the purchase of food to help families put healthy meals on the table. SNAP benefits are provided to households through a once-monthly transfer of funds to an Electronic Benefit Transfer (EBT) card, which operates like a debit card for food purchases at qualifying retailers.

While application procedures vary by state, most SNAP applicants must complete a paper or online application and an eligibility interview with a state eligibility worker. In Arizona, the online SNAP application is part of a larger application called Health-E-Arizona, which also certifies applicants for Cash Assistance (the state name for Temporary Assistance for Needy Families) and Medical Assistance through AHCCCS (the state name for Medicaid), if applicants complete those sections. Laws in Arizona, California, New York City, and Texas also require finger imaging for all people in the applicant household 18 years of age or older. In Arizona, there are a number of community-based SNAP application sites operating; these sites provide staff or volunteers to help applicants complete a paper or online application. In rare cases, community-based application sites are certified to accept and verify supplemental documentation like identification documents, pay stubs, etc. required for application.

As of December 2010, there were more than one million SNAP recipients in Arizona. The average SNAP recipient in Arizona received $127.14 per month, or $1.39 per meal in benefits, assuming s/he consumes three meals per day every day of the month. [17]

Latino households in Arizona are under-enrolled in SNAP, as evidenced by the large difference between the number of Latino likely-eligible individuals and Latino individuals enrolled in SNAP in the state. As of July 2010, 444,176 Latino individuals in Arizona received SNAP[18], while an estimated 605,191 Latino individuals in Arizona were living below 130% FPL, the gross income limit for SNAP eligibility.[19,20] This means that over 161,015 Latino people likely eligible for SNAP were not enrolled,

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[15] Jeff Tyler, "Hispanics leave AZ over immigrant law," *American Public Media* (June 14, 2010), http://marketplace.publicradio.org/display/web/2010/06/14/pm-hispanics-leave-arizona-over-immigrant-law/ (Accessed February 1, 2011).

[16] Center for Immigration Studies, "Morning News 11/12/10," http://www.cis.org/Griffith/MorningNews111210 (accessed February 1, 2010).

[17] Arizona Department of Economic Security, *December 2010 Statistical Bulletin* (2011), https://www.azdes.gov/InternetFiles/Reports/pdf/dbme_statistical_bulletin_12_2010.pdf (accessed February 1, 2011).

[18] Arizona Department of Economic Security, *July 2010 Statistical Bulletin* (2010), https://www.azdes.gov/InternetFiles/Reports/pdf/dbme_statistical_bulletin_07_2010.pdf (accessed December 1, 2010).

[19] U.S. Bureau of Census, *2009 American Community Survey*.

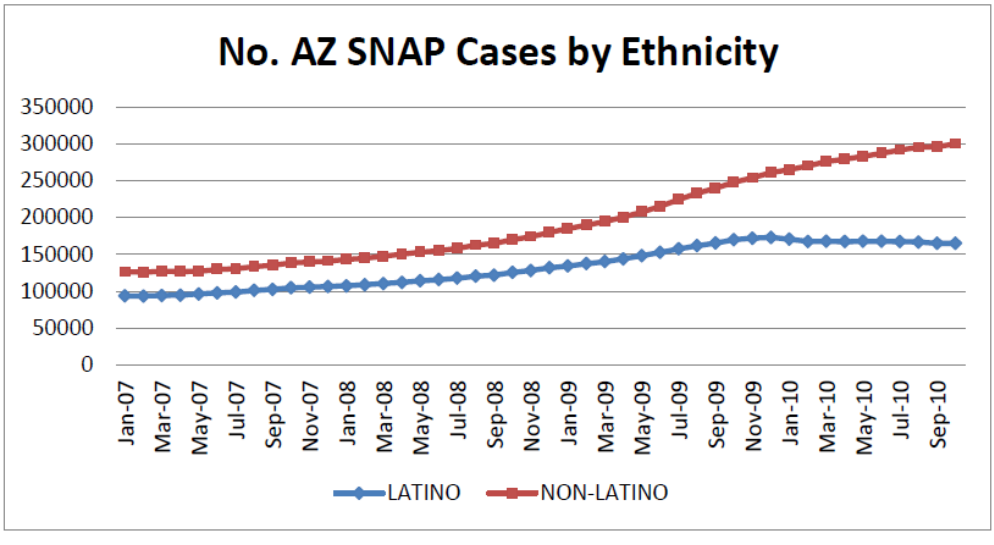
[20] The number of Latino individuals under 130% FPL was estimated by applying the proportion of Arizona residents under 100% who were Latino ([Number Latino individuals under 100% FPL]/[Number all residents

though it should be noted that the number of likely eligible people has been overestimated somewhat, since households must also qualify based on resources, immigration status, and other eligibility rules. LLE families who are not enrolled in SNAP miss out on the benefits of SNAP participation, including decreased risk of food insecurity and improved health, educational, and economic outcomes.[21]

Arizona's Latino SNAP enrollment trend has not kept pace with the enrollment trend for non-Latino residents of Arizona, despite the fact that the economic recession beginning December 2007 had a disproportionately negative effect on Latino individuals in Arizona. Figure 1, below, illustrates the widening gap between Latino and non-Latino SNAP enrollment in Arizona. Between 2007 and 2009, while the poverty rate for Latino residents of Arizona was increasing more quickly than the poverty rate for all residents of Arizona, Latino enrollment in SNAP was falling relative to non-Latino residents, and falling in absolute enrollment beginning December 2009 (Figure 2). This runs contrary to the expected trend, which would predict a narrowing Latino-non-Latino enrollment gap from December 2007 to present because the Latino population was affected more severely by the recession and more Latino residents were unemployed and/or living in poverty.

Figure 3 demonstrates that the decline in Latino child-only SNAP cases in Arizona accounts for some of the decline in Latino enrollment overall. Child-only cases are those in which someone other than a SNAP recipient completes the SNAP application for his/her household. In Latino child-only cases, it is reasonable to assume that parents, who are perhaps ineligible, are applying for their citizen children, who are legally entitled to benefits. Beginning December 2009, the number of Latino child-only cases was declining while non-Latino child-only cases was increasing. Again, this is an unexpected trend since Latino families were disproportionately affected by the recession.

FIGURE 1



under 100% FPL]) to the number of all Arizona residents under 125% FPL and multiplying the product by 1.05. See Appendix B.

[21] Center on Budget and Policy Priorities, *Food and Nutrition Programs: Reducing Hunger, Bolstering Nutrition* (2005), http://www.cbpp.org/cms/?fa=view&id=510 (accessed February 9, 2011).

FIGURE 2

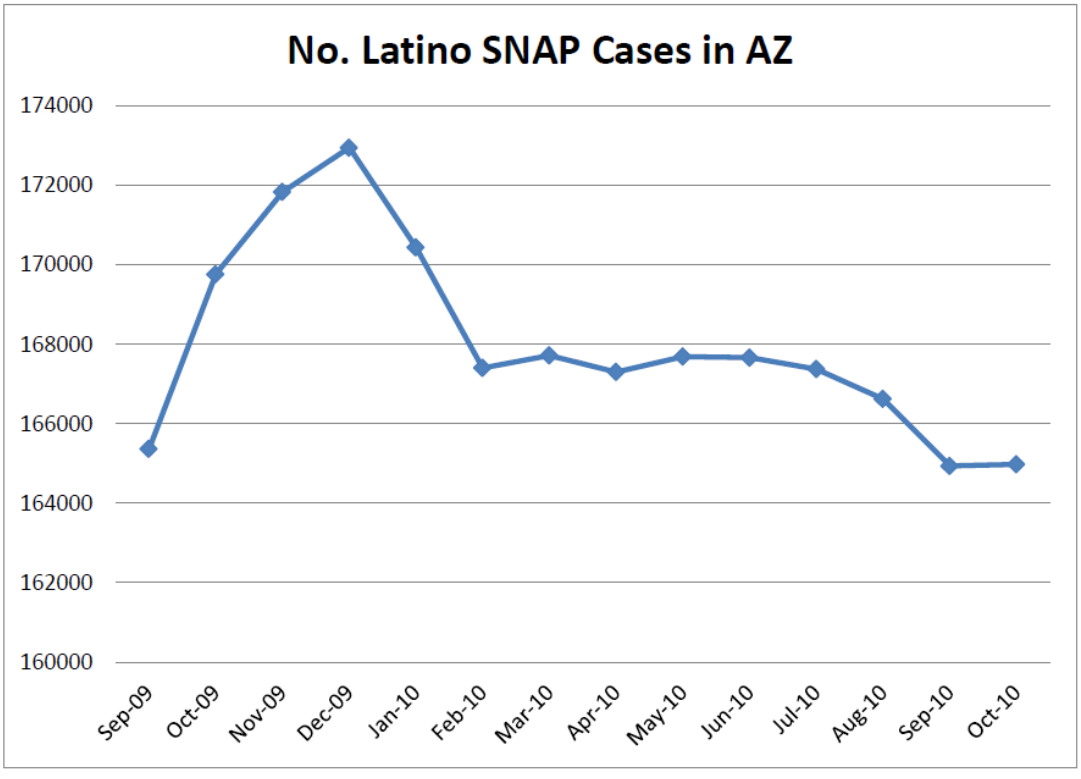
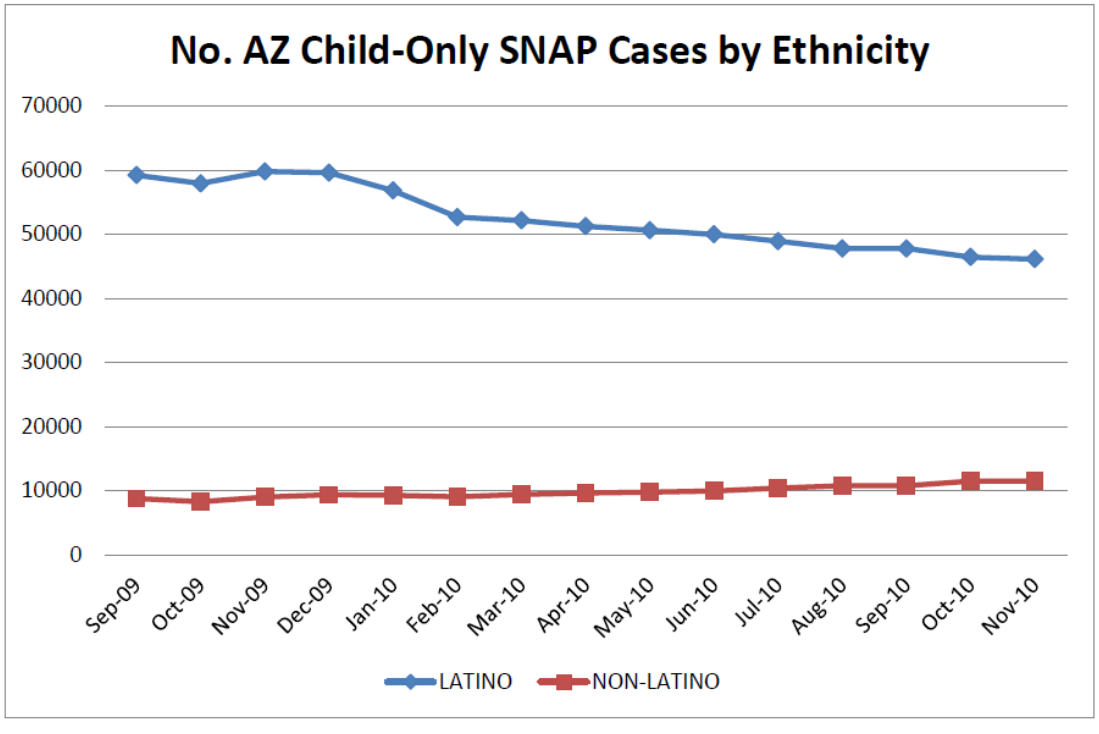
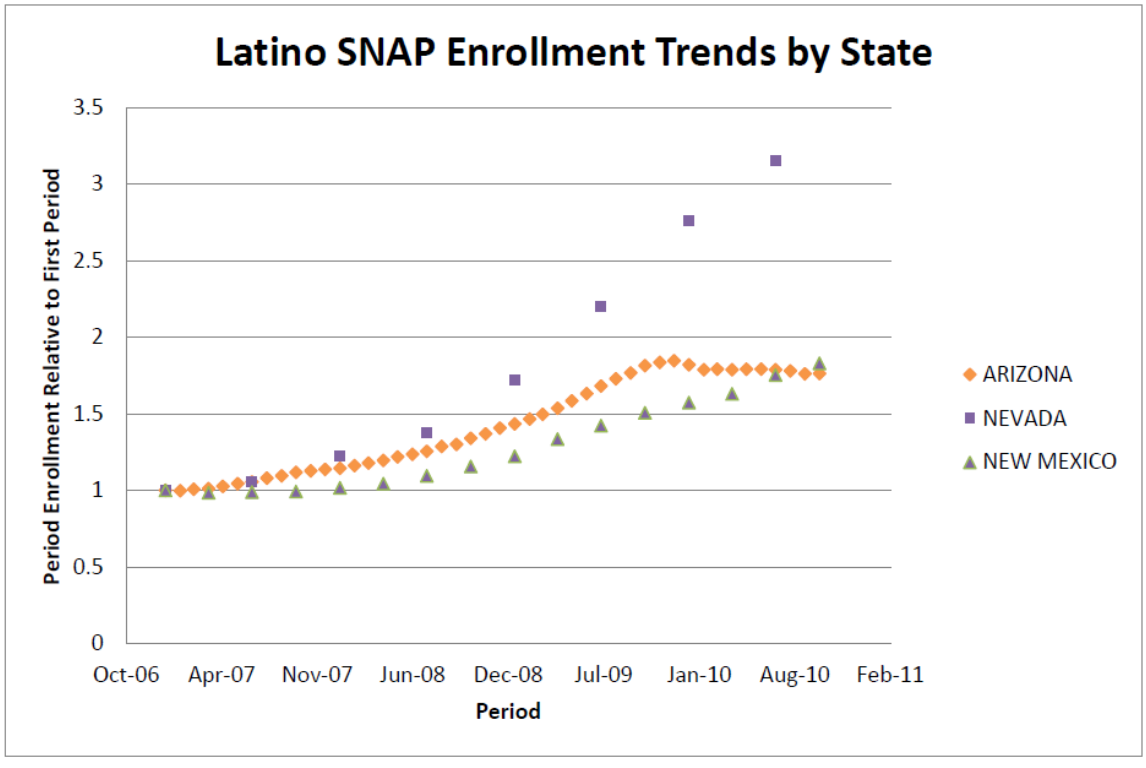


FIGURE 3



Latino SNAP enrollment trends in Nevada and New Mexico demonstrate that the downturn in Arizona's Latino SNAP enrollment is significantly different than the trends in enrollment in comparable states. Enrollment trends for Nevada and New Mexico appear alongside the trend in Arizona in Figure 4. For each state, data points for each time period (months, quarters, or 6-month periods) were divided by enrollment in the first time period for that state. The curves in Figure 4 represent the increases in Latino enrollment by state relative to the baseline enrollment in the first period. Arizona Latino SNAP enrollment trends do not keep pace with the general upswing in enrollment in both Nevada and New Mexico.

FIGURE 4



Together, this evidence suggests that some event or events beginning around December 2009 changed the trajectory of Latino SNAP enrollment in Arizona, while the trajectories of non-Latino SNAP enrollment in Arizona and Latino enrollment in Nevada and New Mexico continued relatively unaffected. Given the exceptional nature of Arizona HB 2008 and SB 1070, their significant media presence, and the qualitative evidence of their negative effects on Latino communities, summarized below, it is reasonable to assume that these laws, passed November 2009 and April 2010, respectively, account for a significant portion of the decline in Latino SNAP enrollment in Arizona.

USDA has seen absolute and relative declines in Latino SNAP participation nationally. "Reaching Low-Income Latinos with Nutrition Assistance" reports that, in 2006, the SNAP participation rate for households with a Latino head was only 56%. As a result, USDA "is making concerted efforts to address barriers to program participation among eligible Latinos, including immigrants." These efforts include targeted outreach to the Latino community, a partnership with the Mexican embassy and consular offices to educate immigrants about nutrition assistance, improvements to the application process for non-English speakers, and the development and dissemination of

"understandable and culturally relevant" nutrition education materials.[22] ACAA's efforts to improve outreach to LLEs support these national efforts to increase Latino SNAP participation.

[…edited for content…]

III. BARRIERS TO LATINO PARTICIPATION IN SNAP

LLEs face myriad barriers to SNAP participation, though they vary significantly by geography and over time. In order to ascertain the place- and time-specific barriers faced by LLEs in Arizona in 2010, the Fellow held interviews with representatives from 30 Arizona-based organizations. Twenty-one of the organizations work directly with LLEs, and their interviewed representatives were loosely categorized as "service providers" here; nine of the organizations are made up of employees who work as advocates, grant administrators, or workers otherwise at least one administrative level removed from likely eligible people, and their interviewed representatives are loosely categorized as "advocates" here. Below are descriptions of the 14 most cited barriers to Latino SNAP participation as revealed through these interviews. The barriers can be understood in four distinct categories: (A) program and eligibility awareness, (B) fears and other personal barriers, (C) obstacles to application completion, and (D) response to follow-up from DES. The categories represent a chronological sequence of events necessary for successful SNAP enrollment: The applicant must be aware of the program, must overcome fears of applying, must fill out the application, and must successfully respond to any follow-up notifications from DES. Together, these barriers form the foundation for the recommendations that follow.

A. Program & Eligibility Awareness

(1) Poor Program Name Recognition

On October 1, 2008, the Food Stamp Program (FSP) was renamed the Supplemental Nutrition Assistance Program (SNAP). The federal name change was implemented pursuant to the 2008 Farm Bill and was meant to reflect "the program's recent modernization and greater focus on nutrition."[23] In response, Arizona DES named the state SNAP program "Nutrition Assistance," translated online as "*Asistencia Alimenticia.*"[24] While program administrators and the state SNAP application are required to use the new state name and USDA-funded outreach providers are required to use the new federal name, there has been little change in common parlance among front-line service

[23] U.S. Department of Agriculture, Economic Research Service, "Briefing Rooms Supplemental Nutrition Assistance Program (SNAP)," http://www.ers.usda.gov/Briefing/SNAP/ (accessed February 1, 2010).
[24] Arizona Department of Economic Security, "Asistencia Alimenticia," https://www.azdes.gov/variant.aspx?id=5199 (accessed February 1, 2010).

providers and likely eligible people, and Spanish translations of the new federal name are inconsistent.

Meetings with service providers revealed that very few service providers or likely eligible people use or recognize the new program name. In English, interviewees were still using the term "food stamps" over the term "SNAP" or "Nutrition Assistance." In Spanish, interviewees were still using the term "*estampillas,*" and some outreach materials still used the old federal name "*Cupónes para Alimentos,*" neither of which reflects the program name change. Interviews revealed that outreach materials referring to the program as the Supplemental Nutrition Assistance Program or Nutrition Assistance in English or Spanish are not widely recognized by likely eligible people as providing information about what was formerly known as the Food Stamp Program and therefore fail to help people understand the program better, as they intend to do.

Especially poor recognition of the Spanish name for SNAP is likely caused by the overly long name and by inconsistencies in use. The USDA Food and Nutrition Service website refers to the program as *el Programa de SNAP* or simply *SNAP* when it uses the new federal name.[25] The Arizona SNAP application lists the program as *Asistencia Alimenticia.* An ACAA-funded online pre-screening tool, www.ArizonaSelfHelp.com, refers to the program as *Programa de Asistencia de Nutrición Complementaria/SNAP*.[26] ACAA's current Spanish language outreach presentation slide show refers to the program as *Asistencia Suplemental de Nutrición.* Lack of program name recognition prevents Spanish speakers from making the connection between the program as described in outreach materials and the program as it is already understood in the community, weakening or nullifying the efficacy of outreach.

(2) Lack of Awareness of SNAP Eligibility Rules

Though many Latino families realize that SNAP exists and have some understanding of the benefits the program provides, they may not be aware of eligibility rules and/or see themselves or their dependents as likely eligible. According to one service provider: "The problem is not that people don't know about the program. I'm blown away how people are so aware of the services that are out there." At the same time, she went on to say that many families do not realize that they are, in fact, eligible for the programs they know exist.

In some cases, lack of awareness of SNAP eligibility rules is a result of misinformation circulating in the community, especially around eligibility of US citizen children of undocumented parents. One service provider discussed, "a new DES policy that says that children of undocumented immigrants are no longer eligible for food stamps." During the five months preceding the interview, she had been instructing families with undocumented members not to apply for SNAP due to this new policy. In fact, the policy does not exist and US citizen children remain eligible.

Current outreach materials provided by ACAA do not offer clear information to counter misinformation around eligibility rules circulating in the community. In particular, materials provide information on gross and net income limits and resource limits, but often gloss over eligibility rules for immigrants. Many outreach materials suggest that immigrants contact legal assistance organizations to find out if they may be eligible.

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[25] U.S. Department of Agriculture, Economic Research Service, "Supplemental Nutrition Assistance Program," http://www.fns.usda.gov/snap/sp-default.htm (accessed February 1, 2010).

[26] Arizona Community Action Association, Arizona Self Help, "Supplemental Nutrition Assistance Program (SNAP)," http://arizonaselfhelp.org/PageProgramPopup?program_id=1 (accessed February 1, 2011).

B. Fears and Other Personal Barriers

(3) Intimidation by "the System"

Many Latino families, especially those who were affected by the recession and are part of the so-called "new poor," feel overwhelmed and confused approaching the complex system of public benefits for the first time. One service provider who directs a hotline for Latino residents of Arizona cited an increase in the number of requests for hotline assistance after an I-9 audit of a Latino grocery chain resulted in the lay-offs of at least 500 predominantly Latino workers. The workers, many of whom were undocumented, had US citizen children and sought SNAP benefits to help purchase food for their children until they found new employment. The service provider emphasized the number of callers who "didn't know where to start." She reported: "I had to get another phone and hire another girl just for those calls…People need customer service on how to apply."

(4) Fear of Reporting and Deportation

LLEs who live in mixed status households are exceptionally hesitant to enroll in SNAP because they are afraid the undocumented members of the household will be reported to Immigration and Customs Enforcement (ICE) and deported from the country. Almost all service providers and advocates cited fear as a primary cause of poor public benefits participation by LLEs in Arizona. One service provider who works with a parents' support group emphasized that fear is a large barrier "to doing anything that involves giving a name." Another service provider who provides mental health services to children, many of whom have experienced the loss of a parent due to deportation, emphasized that there is a "…phobia of deportation; people are living in the shadows." One Health-e-Arizona application assistor "received word that a son and his mother wanted to apply. The mother was in desperate need of…assistance. Her son called and said that she was so scared she wouldn't even come out of her house."

Due to the fear of reporting and deportation and the hostile environment created for Latino families, likely eligible people are reluctant to trust new information about accessing benefits, especially when the information comes from people outside the trusted community. For these reasons, public information campaigns have failed to reach the most vulnerable people. Several service providers relayed their efforts to educate undocumented parents to respond to DES questions with, "I am only applying for my children," but reported that families still refused to apply because they felt they might be tricked into revealing too much information or may be reported despite the fact that the eligibility worker had not made a valid "discovered violation" under HB 2008. Even some experienced community workers expressed frustration that, though they possess valid information about the risks of being reported, "it is hard to get that out into the community." The director of the Spanish language hotline emphasized fear that, although DES workers had been trained on what did and did not constitute a "discovered violation," some reported suspected undocumented people regardless of the regulations as stated in HB 2008 and were operating as "rogue minutemen" within the DES offices.

Additionally, many interviewed service providers who are trusted by the community expressed confusion or relayed misinformation about the risks of reporting and deportation, precluding them from providing correct information to LLEs. One community nutrition educator reasoned: "DES workers ask you about your citizenship and they share that information. If you're undocumented, why would you do that?" Another service provider remarked: "One major reason that people don't seek services is because of their illegal status and the fact that anything they applied for would be reported." While DES workers can report discovered violations under certain conditions, the service providers interviewed did not seem aware of the regulations limiting reporting of undocumented people to immigration authorities. Attempting to protect their clients, many service providers recirculate misinformation about the risk of deportation from applying for SNAP in Arizona.

(5) Effects on Legalization Process

Mixed status households often do not apply for SNAP for fear that undocumented members will be deemed a public charge, which is defined as "an individual who is likely to become primarily dependent on the government for subsistence," when applying for a green card. In fact, participation in SNAP is not considered in the public charge determination. According to the Department of Homeland Security US Citizenship and Immigration Service:

> "Non-cash or special-purpose cash benefits are generally supplemental in nature and do not make a person primarily dependent on the government for subsistence. Therefore, past, current, or future receipt of these benefits do not impact a public charge determination. Non-cash or special purpose cash benefits that are not considered for public charge purposes include…Nutrition programs, including Food Stamps, the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), the National School Lunch and School Breakfast Program, and other supplementary and emergency food assistance programs…."[27]

Nevertheless, many service providers cited fear of becoming a public charge as a major deterrent to Latino SNAP participation. One front-line family counselor serving people covered under Medicaid asserted that many clients opted out of the SNAP portion of the benefits application because, "the more reason you give the government, the less likely you will become legal." Another application assistor confirmed that her families also opt out of the SNAP portion of the application because they "want to apply for the bare minimum in assistance [so that] if immigration reform ever happens, they…[are] able to show that they have been able to financially support themselves." It was unclear from their comments whether service providers understood that SNAP participation is not considered in the public charge determination.

(6) Perceptions of Benefit Levels

Several service providers mentioned that the widely held belief that LLEs, especially single, elderly people, receive only the minimum monthly SNAP benefit deters them from applying. Two service providers seemed to believe themselves that most, if not all, seniors received exceptionally low benefits. One family advocate lamented: "What should I say when seniors only get about $30? That is not enough; that doesn't do anything." Another *promotora* echoed a similar sentiment: "It is sad that elderly people only get $10. That's not worth their time and effort and doesn't help enough when you're on a fixed income."

The Food Research and Action Center confirms that one of the primary reasons for under-participation by seniors of all ethnicities across the US is the myth that seniors only get the minimum monthly benefit, $16, when, in FY08, the average monthly benefit for all persons over 60 was $76.[28] Current ACAA outreach materials address this issue in a Myths/Facts and *Mitos/Realidad* sheet, but it seems the information has not yet been absorbed by many Latino-serving service providers.

(7) Concern for Neighbor & Pride in Self-Sufficiency

Many Latino families are reluctant to participate in SNAP because they take pride in being able to provide for their families and solve problems within the family unit. One family counselor agreed:

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[27] U.S. Citizenship and Immigration Services, "Public Charge," http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnextoid=829b0a5659083210VgnVCM100000082ca60aRCRD&vgnextchannel=829b0a5659083210VgnVCM100000082ca60aRCRD (accessed February 1, 2011).

[28] Food Research and Action Center, "Seniors and SNAP/Food Stamps," http://frac.org/initiatives/addressing-senior-hunger/seniors-and-snapfood-stamps/ (accessed February 1, 2011).

"People are proud that they work hard and can provide for their families without using resources outside the home." These families, even with a high level of need, are difficult to reach with program outreach regardless of the amount and type of program information available.

Many LLE families are also less likely to view themselves as eligible for SNAP and may believe that their use of public benefit programs like SNAP diminishes the pool of available resources for other families. One service provider theorized that, "first generation immigrants are not used to all these services" compared to the services provided in their countries of origin. She continued: "If they are getting by, even if it is the bare minimum, they say that there is someone worse off than me." These views exist despite the fact that SNAP is a federal entitlement program, meaning that all who are deemed eligible are funded to receive benefits.

C. Obstacles to Application Completion

(8) Access to DES Offices

Latino families experience myriad challenges when attempting to apply for services in a DES office, including long wait times, geographic inaccessibility, lack of transportation, and lack of child care. Interviews with service providers revealed that wait times in DES offices range from three to seven hours. One community-based application assistor asserted: "The DES offices are slammed due to budget cuts and increases in applications," and suggested that LLEs visit community-based application sites like the one where he works. Another worker providing outreach to people with disabilities lamented: "DES offices require a six to seven hour wait, something I saw first-hand while doing consulting work…" Long wait times preclude many people with disabilities from receiving services because, for example, "a colostomy bag just doesn't work in a DES office." Wait times were especially bothersome for families who only wanted to drop off completed paperwork. One community-based application assistor said: "People complain about wait times. People have to wait three or four hours just to drop off an application."

LLEs must overcome geographic inaccessibility and transportation issues to get to a DES office. One community organizer in South Phoenix pointed out that budget cuts had resulted in the closure of some social service offices in her area. In response, several churches began to host community-based application sites. The director of a resource center for parents admitted that their referrals to DES offices are not always effective because DES offices are far away and "many people in this area do not have cars;" though families walk or use the city bus, "the city bus takes money."

Finally, many families avoid DES offices because they have children and do not want to bring their children to the office or to their eligibility interviews. DES offices do not have welcoming spaces for children to play, do not offer child care, and require children, like parents, to wait for several hours. Additionally, undocumented parents with US citizen children may be hesitant to bring their children to the office because they are afraid, if the children are aware of a parent's undocumented status, "they may say something in the interview" that would reveal a household members' undocumented status and result in a report to ICE.

(9) Comfort with DES Personnel

Many Latino families do not seek services in DES offices due to the perception of poor customer service at DES offices. One community-based application assistor attested to the fact that DES workers often treat her and her clients with disrespect: "It's all 'hurry up and understand me' and 'why don't you understand me?' DES workers do not give applicants the benefit of the doubt." Another community-based application assistor in Tucson agreed: "The offices are intimidating…it's hard to speak to a human, [DES workers] are rude…It's just not a welcoming environment." A third assistor said she had heard, "horror stories about cattle calls, where six or seven people were being

called back at a time." Several interviewees also mentioned that applicants feel that DES workers are judging them and often "act like they don't want to be there."

Families that include undocumented members often feel the issue moves beyond rudeness; they fear that DES workers are actively trying to "trick" or "stump" them during the eligibility interviews. One service provider felt that DES workers "intentionally lose documents, especially documents from Latino families." Other families report feeling that a DES worker will say one thing and do another, resulting in a very low level of trust between the applicant and the agency worker. The director of a Spanish language hotline reported a widespread perception that DES workers saw themselves as personally responsible for enforcing immigration law. Immediately following HB 2008 applicants were often asked for social security cards. When applicants failed to produce the cards, DES workers would insist: "Why don't you have a social?" Some of the mistrust likely results from the unequal power dynamic created by the reporting process. While there are clearly stated regulations governing the reporting of discovered violations under HB 2008, Latino families fear they will face deportation even if they are reported for reasons not specified in HB 2008, whereas it is unclear whether DES workers face consequences for failing to follow HB 2008 regulations for reporting.

(10) Application-Related Issues

LLE families face four major barriers to completing the SNAP application on their own: (1) hesitancy to answer some online application questions, (2) hesitancy to submit finger images, (2) difficulties collecting the necessary documents, and (4) lack of internet access. First, one application assistor reported that the online application does not advance to the next page unless families make a selection in the race/ethnicity field, while the paper application can be completed without that information. Families that believe DES workers engage in discrimination against Latino applicants and fear repercussions against undocumented family members may be less likely to complete the online application if they must answer the race/ethnicity question.

Second, finger imaging is a major barrier for some LLE families. One nutrition and safety educator suspected that some families avoid finger imaging because they fear the images will appear when they apply for a green card. She explained that when families apply for legal residency in the US, immigration authorities verify that the applicant has never been fingerprinted while crossing the US border illegally. Families that include members who may want to apply for legal residency at some point in the future may not want to have family members' fingers imaged for fear that those images would be included in the database search results and may be confused for prints taken at the border or may be considered in a public charge determination. In other cases, households' SNAP applications are delayed as a result of technical issues with the finger imaging system. A community outreach worker related the story of one woman who was denied benefits because DES found her fingerprints in the DES database under a different name. After a long struggle, DES workers discovered that she had her fingers imaged using just one last name, while she had submitted the most recent set using both last names.

Third, LLE households have significant difficulty collecting the documents necessary to apply for SNAP. One mental health provider hypothesized that immigrant families are less likely to understand which documents are important and may misplace them at rates higher than non-immigrants. Loss of important documents becomes a major issue when it intersects with a family's fear around immigration-related legislation. An immigration attorney offered: "People are scared of getting their records [and] going to the courts…" Fear of this type precludes members of undocumented families from interacting with the many governmental offices and personnel required to request new identification. LLE households cannot apply for SNAP if they do not possess the necessary documents to prove residency, income, employment, etc.

Fourth, DES efforts in the last several years have focused on increasing awareness and ease of use of the online SNAP application, but many Latino families lack internet access. One advocate for people with disabilities said of her Latino customers: "80%-90% of my customers do not have computers. Libraries do not help many people because they have transportation issues. Dial-a-Ride doesn't cut it." A parent advocate agreed that some families can access Internet at libraries, "but then they have to get to the library." A migrant rights worker who spearheaded a multi-faceted campaign to educate constituents about SB 1070 said that "one lesson learned from the SB 1070 campaign" was that many otherwise interested Latino supporters lack Internet access at home.

(11) Language Access

Language access remains a major obstacle to SNAP enrollment for Spanish-speaking LLE families because outreach materials are often not provided in Spanish or are poorly translated into Spanish. Referring to public benefits outreach materials, a migrant rights employee pointed out that, despite having a high Limited and Non English Proficient population, "no one writes anything in Spanish in this state."

When outreach materials are provided in Spanish, they are difficult to understand because they use overly complex syntax and vocabulary or they are poorly translated. One parent educator reported special efforts on her part to provide materials that use words accessible to parents who did not have access to public education in their countries of origin. While LEP and NEP individuals may be fluent in Spanish, the parents' level of literacy is a consideration in creating printed outreach materials. The public relations director of a large Latino-serving organization discussed the importance of giving equal attention to the quality of Spanish translation. He pointed out that it is often ineffective to rely on a "one-time translation." Translations for English words and phrases vary across Latino subgroups based on country and region of birth and length of time in the US.

(12) Insufficient and Under-resourced Community-Based Application Sites

Several community-based SNAP application sites reported difficulties adequately serving LLEs due to lack of staff experience or lack of funding. One community-based application site reported: "We could do tons of applications every day if we had time. We have not marketed it because we are scared of how many we would have to do." In addition, the assistors at that site felt that they "didn't do it very well" as evidenced by the low rate of application acceptance. Despite training, the assistors had difficulty because "cases are very complicated" and because they do not feel well equipped to reconcile application issues with DES workers.

Another community center, which provides a DES worker to interested applicants one day during each month, reported having difficulty filling those appointments despite serving many likely eligible people in other programs at the center. The *promotoras* admitted: "We don't promote SNAP because we don't have the resources…It is hard to fill those five appointments because, when people want to apply, they want to do it today."

The leader of a coalition of Latino community members explained their inability to meet the needs of their constituents: "Organizations are not doing enough to outreach to likely eligible people…Latino community groups are very good at dealing with civil rights issues and racial profiling, but less experienced dealing with health and human service issues." Despite having the interest and trust of likely eligible Latino individuals, many Latino community-based organizations do not provide adequate SNAP outreach to their clients.

D. Response to Follow-Up from DES

(13) Response to Requests for Follow-Up

Families often fail to respond to mailed requests from DES for additional documents that would either (1) complete a SNAP application and result in an eligibility determination, or (2) renew an eligible family's benefits. In cases where a household's initial application has not been fully processed due to missing information, families often do not understand DES notices due to the complexity of the language in the notices or decide not pursue what is perceived to be a too lengthy application process. One nutrition educator related a story where a DES letter asked an eligible family to bring in documents to "prove citizenship". Because the household contained undocumented members and the household misinterpreted the request, the family was afraid and did not respond. One Latino community relations director explained that the complicated, time-intensive process of applying for SNAP presents a barrier to his community. He said: "If things can't get done in just a few steps, many people will say 'forget about it, I'm out of here.'" The director asserted that a "culture of paperwork" exists in the US that does not exist in the countries of origin of many of Arizona's immigrants and may deter some LLE households from completing the application process.

Interviews also confirm that recent failures by Latino households to follow up notices for renewal are often the result of fear around HB 2008 or SB 1070. One referral coordinator said simply: "After SB 1070, many families who were receiving AHCCCS and other services did not renew." Evidence from a hotline director corroborated: "The drop-off in SNAP enrollment began when people received notices to renew and chose not to do so."

Current ACAA materials provide accurate program information and instructions for applying but do not include instructions on responding to follow-up from DES or information on the renewal process.

(14) Appeals to Wrongful Actions

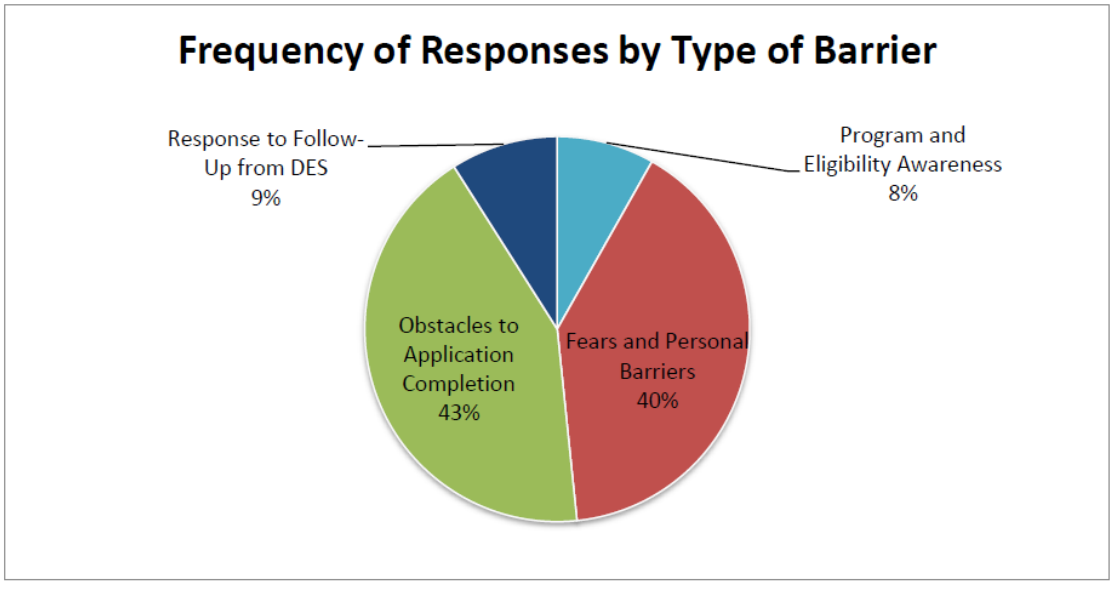
Some LLEs who do apply for SNAP feel they are wrongfully denied or feel their benefits have been wrongfully reduced, and they do not appeal their cases. In some instances, families simply feel defeated. An application assistor commented that, "many people do not receive SNAP because they have been denied and given up." The process required to correct the problem is too labor-intensive for families with working parents. One service provider discussed her own experience applying for SNAP: "Personally, I applied when I was first pregnant. They DES worker incorrectly doubled my salary, so I wasn't eligible." She described the long process involved in correcting the mistake and concluded that, "many people are not willing to speak out" like she was.

Still other families are hesitant to appeal wrongful rejections or benefit reductions because they fear immigration-related repercussions for members of their household. The hotline director said there is "significant fear around appealing a case" and that families often ask "is it worth it" to appeal when they fear a DES worker may "do something to [the] case". Several service providers described families who were likely eligible but were denied benefits and did not appeal their cases. They assumed the rejection was related to the undocumented status of one or more people in the household, despite the fact that those members were not included in the applicant household. The families feared calling further attention the family member's undocumented status by appealing the eligibility determination.

E. Discussion of Barriers

The most common barriers cited by interviewees are presented above, though the frequency of responses differed across the 14 barriers. As illustrated in Figure 5, below, barriers in the two categories "fears and personal barriers" and "obstacles to application completion" represented over 80% of the 122 coded responses. Within the category of "fears and personal barriers," the vast majority of responses fell under the subheadings "fear of reporting and deportation" and "effects on the legalization process." Together, responses in these two subheadings alone represented 21%, or 26, of all 122 responses and 53% of all responses categorized as "fears and personal barriers." Within the category of "obstacles to application completion," the majority of responses fell under the subheadings of "comfort with DES personnel" and "application-related issues." Responses under these two subheadings alone also represented 21%, or 26, of all 122 responses and 50% of all responses categorized as "obstacles to application completion." Efforts to improve SNAP outreach to LLEs should focus on addressing issues listed in "fears and personal barriers" and "obstacles to application completion."

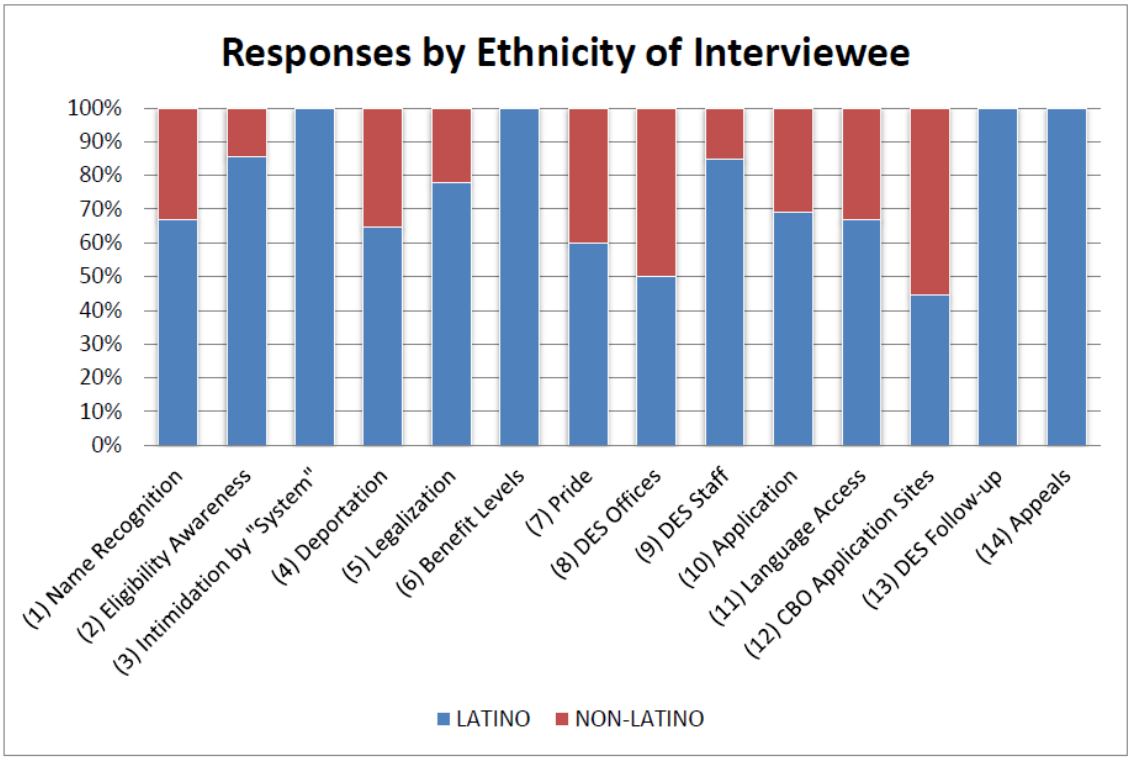
FIGURE 5



Additionally, there were significant differences in responses given by Latino and non-Latino interviewees. The Fellow conducted interviews with representatives from 30 organizations in Arizona; since some interviews involved more than one representative from each organization, there were a total of 40 interviewees. 17 interviewees were non-Latino and 23 were Latino as determined by the Fellow based on conversation with the interviewee. As illustrated in Figure 6, below, Latino interviewees offered many more responses to questions about barriers to SNAP participation than did non-Latino interviewees; thus responses from Latino interviewees make up the majority of responses in every barrier subheading. Even so, the chart shows that barriers related to "intimidation by 'the system'," "perceptions of benefit levels," "response to requests for follow-up," and "appeals to wrongful actions" were identified only by Latino interviewees. Non-Latino interviewees were more likely to identify barriers related to "access to DES offices" and "insufficient and under-resourced community-based application sites" than other barriers.

These differences are problematic because barriers reported by Latino interviewees are less likely to be heard by decision-making bodies in Arizona. Latino interviewees for this project were much more likely to be service providers, who work in community-based organizations with community members, while non-Latino interviewees were much more likely to be advocates, who administer grants and programs and intervene in the public policy making process. It is problematic that, as indicated below, Latino and non-Latino interviewees identified different barriers to SNAP participation, and Latino interviewees, in the course of their jobs as service providers, have less access to public platforms from which they can give voice to those barriers.

FIGURE 6



IV. HIGH OPPORTUNITY AREAS IN ARIZONA

A. Summary of Data and Methods

The second goal of this project was to identify the number and location of LLEs not participating in SNAP in order to prioritize geographic areas for increased SNAP outreach and relationship-building with Latino-serving organizations. The Fellow calculated both the SNAP participation gap and the SNAP non-participation rate for LLEs for each county and every ZIP code in Arizona for which both poverty and SNAP enrollment data were available. The SNAP participation gap is defined here as the difference between the number of LLEs in a given geography and the number of Latino individuals enrolled in SNAP. The SNAP non-participation rate is defined here as the percent of LLEs in a given geography not enrolled in SNAP; it is calculated by dividing the SNAP participation gap in a given geography by the number of LLEs in that geography.

High opportunity areas are geographic areas in which the potential for SNAP outreach impact is high; they may be areas with high LLE SNAP participation gaps and/or areas with high SNAP non-participation rates for LLEs. Areas with high SNAP participation gaps are generally areas with higher population density and higher LLE populations and therefore higher opportunity for absolute SNAP enrollment increases. Areas with high SNAP non-participation rates are generally more rural areas with smaller LLE populations and access to fewer social service providers; therefore, these areas have high opportunity for percent increases in SNAP enrollment, but the percent increases represent fewer LLE individuals. Because ACAA's priority is to enroll the greatest number of LLEs possible in SNAP, this report prioritizes areas with high SNAP participation gaps over areas with high SNAP non-participation rates.

The Fellow adapted the first several steps of a formula developed by the Food Research and Action Center[29] for a method developed in consultation with staff at the USDA Western Regional Office to calculate the SNAP participation gaps and SNAP participation rates using poverty data from the US Census Bureau's 2005-2009 American Community Survey (ACS) estimates and July 2010 SNAP enrollment from DES. The 5-year ACS estimates are provided by 2000 census tract, while the SNAP enrollment data is provided by 2010 ZIP code. To find SNAP participation gaps by ZIP code, the Fellow converted ACS data from 2000 census tracts to 2000 ZIP Code Tabulation Areas (ZCTA), which are roughly equivalent to US Postal Service ZIP codes, using a correlation list provided by the Missouri Census Data Center[30], a US Census Bureau local affiliate.[31,32]

The use of data gathered during different years and from within different geographic boundaries presents several limitations, which are fully outlined in Appendix B. The most important limitations to note here are:

- Because information on resources and citizenship status is not available by ethnicity at highly localized geographic levels, the number of LLEs presented in this report represents Latino people who are likely eligible for SNAP based on gross income alone. The Fellow was unable to subtract Latino individuals who would not be eligible based on resources, citizenship status, and other factors, thereby overestimating the number of LLEs.
- The ACS poverty data represents the average of data in a geography from 2005-2009, which includes data from nearly three years before the official start of the most recent economic recession, after which Latino poverty rates increased. The poverty data used here does not reflect fully the effects of the recession on Latino households, thereby underestimating the number of LLEs.
- Because (1) poverty data had to be converted to 2000 ZCTA, (2) SNAP enrollment data was provided by 2010 ZIP, and (3) US Postal Service ZIP code boundaries have changed since 2000, information on the number of LLEs in a given ZIP should be interpreted and used with caution.

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[29] Food Research and Action Center, *SNAP Access in Urban America: A City-by-City Snapshot* (2011), http://frac.org/initiatives/addressing-senior-hunger/seniors-and-snapfood-stamps/ (accessed February 7, 2011).

[30] Missouri Census Data Center, *MABLE/Geocorr2K: Geographic Correspondence Engine with Census 2000 Geography* (2010), http://mcdc2.missouri.edu/websas/geocorr2k.html (accessed December 1, 2010).

[31] U.S. Bureau of Census, "State Data Center Program," http://www.census.gov/sdc/index.html (accessed February 7, 2011).

[32] The correlation list was extracted using Geocorr, a tool developed at the Socioeconomic Data and Application Center and Columbia University, and composed of data from the Master Areas Block Level Equivalence (MABLE) database, a geographic database maintained by the Missouri Census Data Center.

B. High Opportunity Counties in Arizona

The Fellow estimates that, as of July 2010, there were 161,015 LLEs in Arizona not enrolled in SNAP. Using the average monthly benefit for an individual of any ethnicity enrolled in SNAP in Arizona in July 2010 as reported by DES[33], the statewide SNAP participation gap represented an estimated $248M in SNAP benefits not claimed in 2010. The USDA Economic Research Service estimates that every SNAP dollar multiplies 1.84 times in the local economy in which it is spent[34]; a loss of $248M SNAP dollars represents an ultimate loss of $457M in local economic activity across Arizona in 2010.

The LLE SNAP participation gaps and the LLE SNAP non-participation rates vary by county in Arizona. As indicated in Chart 1, below, the two counties with the highest SNAP participation gaps and therefore with the highest opportunity for increased absolute SNAP enrollment are Maricopa County, in which the Phoenix metropolitan area is located, and Pima County, in which Tucson is located. Maricopa County has an LLE SNAP participation gap of 121,086, representing $186M lost in unclaimed SNAP benefits, which multiplies up to $342M in lost local economic activity in 2010. Pima County has an LLE SNAP participation gap of 17,607, representing nearly $27M lost in unclaimed SNAP benefits, which multiplies up to $47M in lost local economic activity in 2010. The two counties with the highest SNAP non-participation rates and therefore with the highest opportunity for percent SNAP enrollment increases are Apache County and Greenlee County, where 48.8% and 48.2% of LLEs are not enrolled in SNAP, respectively. Data for each county in Arizona, ordered from highest to lowest participation gap, is detailed in Chart 1, below. Participation gaps for Navajo and Graham counties are negative because the formula for calculating LLEs found a lower average number of LLEs living in those counties between 2005 and 2009 than were enrolled in SNAP in 2010. It is not possible for SNAP enrollment to exceed the number of likely eligible people, but it is reasonable to conclude that these counties are well served relative to the other counties in Arizona.

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[33] Arizona Department of Economic Security, *July 2010 Statistical Bulletin* (2010), https://www.azdes.gov/InternetFiles/Reports/pdf/dbme_statistical_bulletin_07_2010.pdf (accessed December 1, 2010).

[34] Hanson, Kenneth, E. Golan. Effects of Changes in Food Stamp Expenditures across the U.S. Economy. USDA/ERS, August 2002

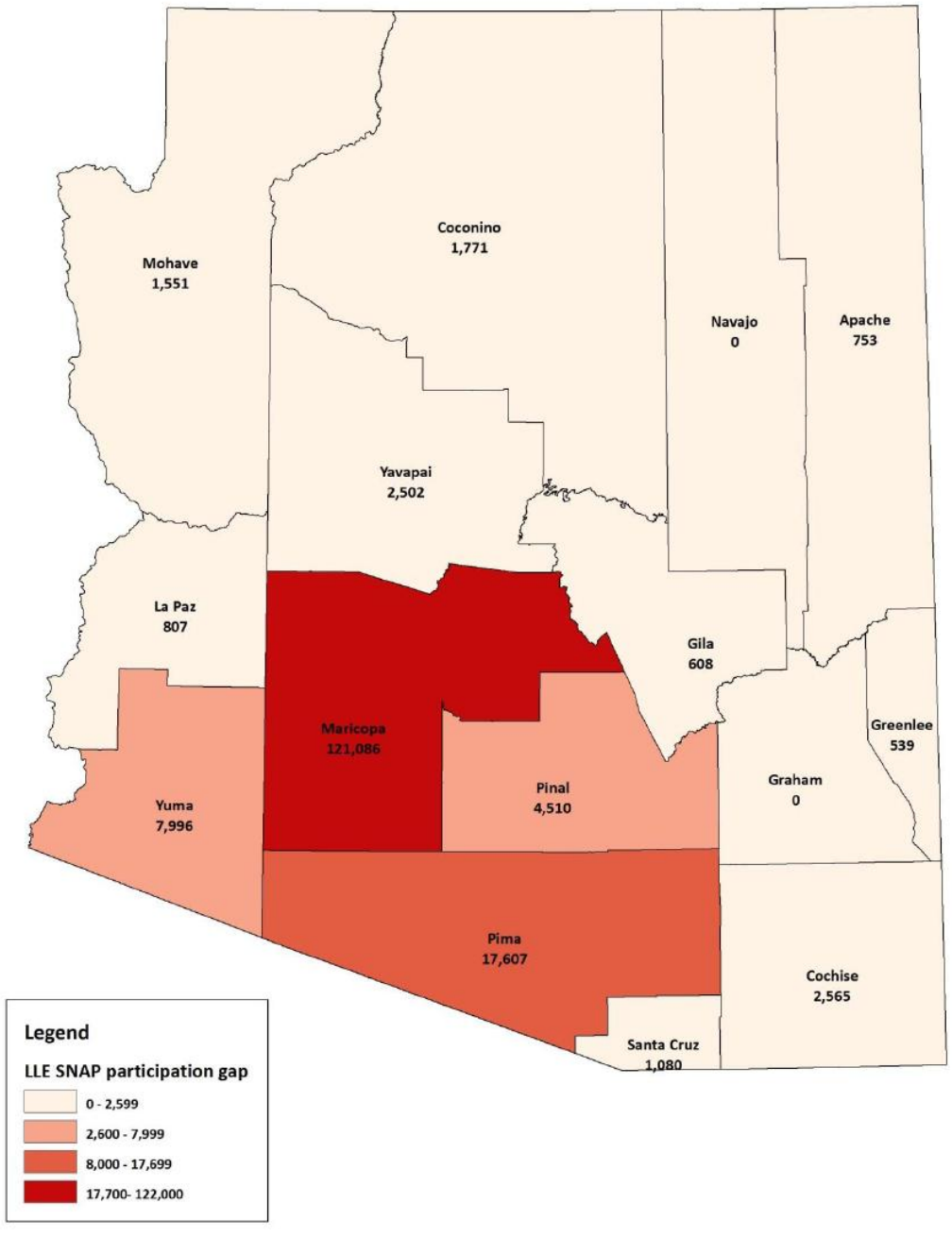
U.S. Department of Agriculture, Economic Research Service, *Effects of Changes in Food Stamp Expenditures across the U.S. Economy* (Washington, DC, 2002), by Kenneth Hanson and Elise Golan, http://www.ers.usda.gov/publications/fanrr26/fanrr26-6/fanrr26-6.pdf (accessed February 1, 2010).

CHART 1

	LLE SNAP PARTICIPATION GAPS AND NON-PARTICIPATION RATES		
	COUNTY	PARTICIPATION GAP	NON-PARTICIPATION RATE
1	Maricopa	121,086	31.74%
2	Pima	17,607	17.19%
3	Yuma	7,996	19.49%
4	Pinal	4,510	20.26%
5	Cochise	2,565	17.19%
6	Yavapai	2,502	31.66%
7	Coconino	1,771	39.28%
8	Mohave	1,551	18.42%
9	Santa Cruz	1,080	9.45%
10	La Paz	807	40.07%
11	Apache	753	48.83%
12	Gila	608	21.52%
13	Greenlee	539	48.24%
14	Navajo	-70	-2.57%
15	Graham	-615	-26.99%

The map that follows displays the SNAP participation gaps for all counties in Arizona. The negative SNAP participation gaps for Navajo and Graham counties were changed to 0 for purposes of simplicity. Counties are shaded based on the size of the SNAP participation gap; darker shading indicates higher SNAP participation gaps. As is evident, the highest opportunity for SNAP outreach impact is concentrated in the southwestern portion of the state.

LLE SNAP Participation in Arizona



C. High Opportunity ZIP Codes in Arizona

Charts 2 and 3, below, show the 10 ZIP codes with the highest LLE SNAP participation gaps and highest LLE SNAP non-participation rates, respectively. The 10 ZIP codes with highest SNAP participation gaps were generally concentrated in Maricopa and Pima counties, while the 10 ZIP codes with the highest LLE non-participation rates were concentrated in Pinal County.

CHART 2

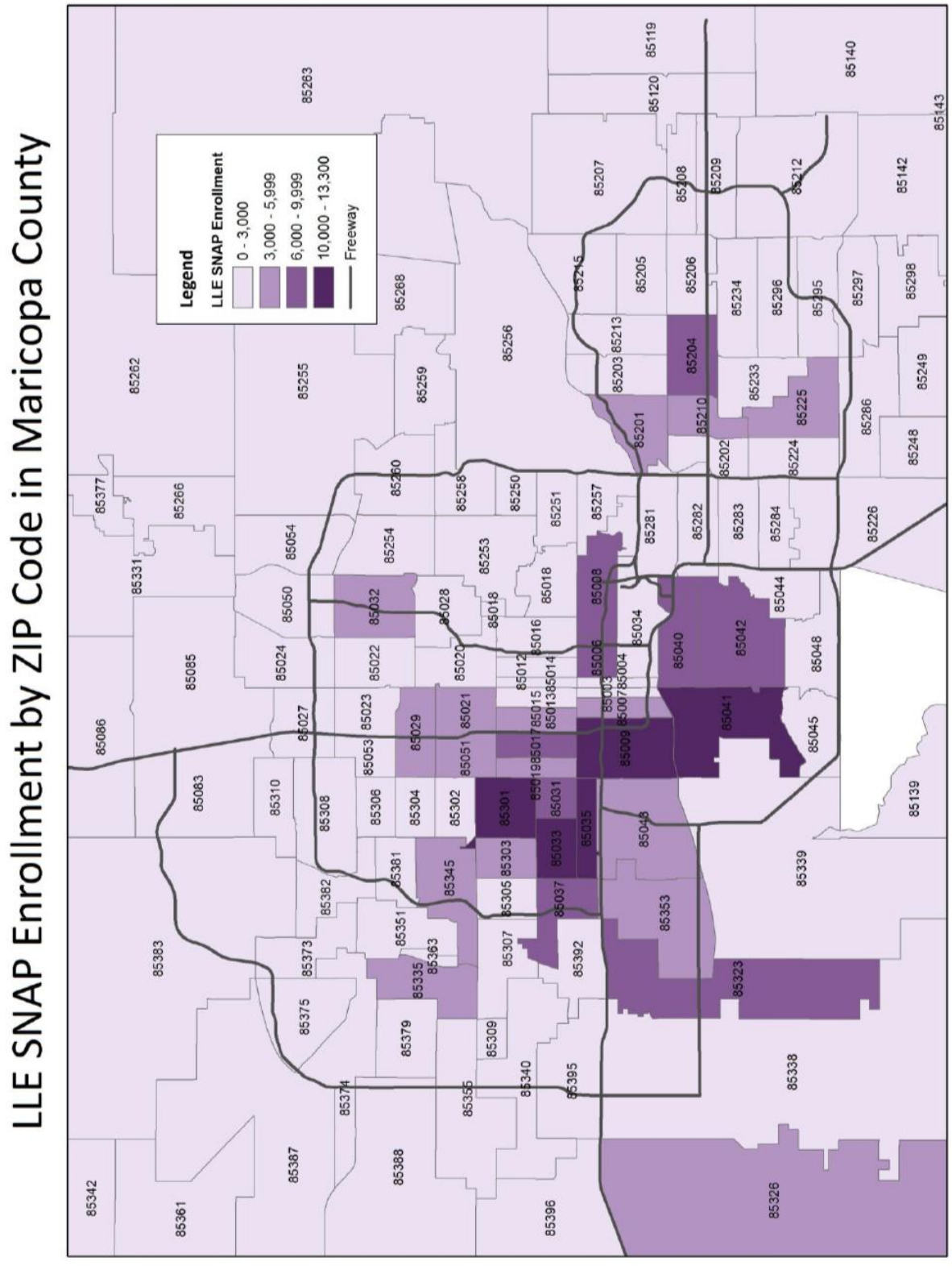
	ZIP CODES WITH HIGHEST LLE SNAP PARTICIPATION GAPS			
	ZIP	COUNTY	PARTICIPATION GAP	NON-PARTICIPATION RATE
1	85706	PM	29,082	64.78%
2	85364	YU	14,844	51.12%
3	85705	PM	12,879	61.69%
4	85008	MA	12,028	55.47%
5	85222	PN	11,642	99.01%
6	85040	MA	10,655	62.18%
7	85746	PM	10,125	55.25%
8	85713	PM	9,743	45.98%
9	85017	MA	8,213	52.79%
10	85009	MA	7,992	37.55%

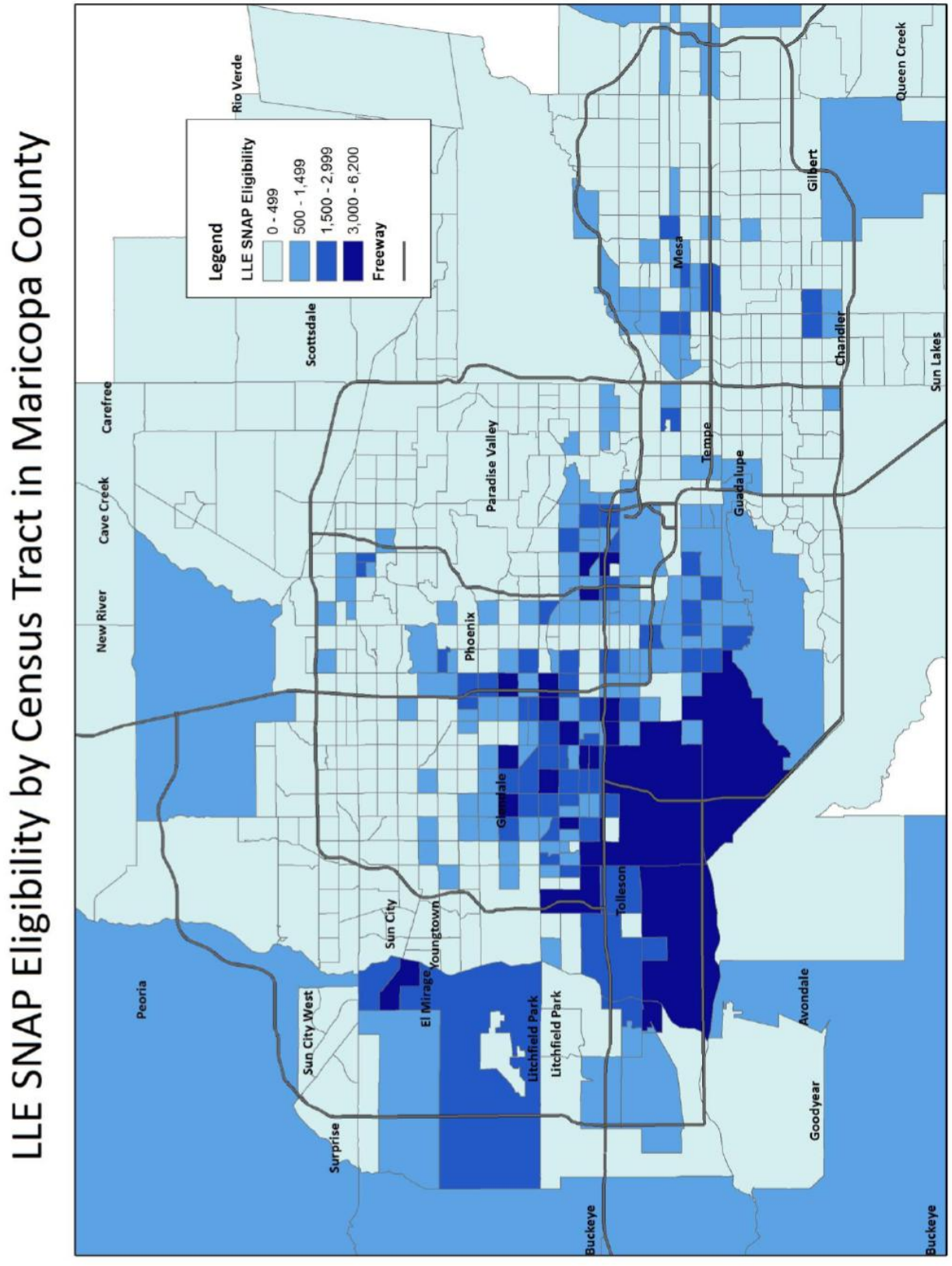
CHART 3

	ZIP CODES WITH HIGHEST LLE SNAP NON-PARTICIPATION RATES*			
	ZIP	COUNTY	PARTICIPATION GAP	NON-PARTICIPATION RATE
1	85236	MA	393	99.75%
2	85228	PN	3,549	99.55%
3	85273	PN	1,536	99.22%
4	85222	PN	11,642	99.01%
5	85219	PN	653	98.79%
6	85708	PM	566	98.78%
7	85232	PN	1,079	98.63%
8	85220	PN	1,893	98.54%
9	85239	PN	4,378	98.43%
10	85231	PN	5,863	97.54%

*And a participation gap ≥100

The maps that follow help visualize SNAP participation gaps across Maricopa County, since Maricopa County has the highest opportunity for SNAP enrollment increases. Due to limitations in the data available (see Appendix B) and for the purposes of individual map clarity and completeness, the LLE SNAP enrollment numbers are mapped by 2010 ZIP code and the location of LLEs across Maricopa is mapped by 2000 census tract. In the first map, ZIP codes are shaded by LLE SNAP enrollment; darker shading indicates high LLE SNAP enrollment. It is evident that most Latino individuals enrolled in SNAP live in Central Phoenix near the intersection of Interstate 10 and Interstate 17. In the second map, census tracts are shaded by the number of LLEs residing there; darker shading indicates a larger numbers of LLEs residing in the tract. As shown, the census tracts with the highest numbers of LLEs are concentrated in South Phoenix and Tolleson. Because most LLEs are concentrated in South Phoenix and Tolleson south of Interstate 10, and most LLEs enrolled in SNAP are concentrated in South Phoenix and Tolleson north of Interstate 10, the maps reveal a possible LLE SNAP participation gap in Tolleson south of Interstate 10.


LLE SNAP Enrollment by ZIP Code in Maricopa County
Legend
LLE SNAP Enrollment
0 - 3,000
3,000 - 5,999
6,000 - 9,999
10,000 - 13,300
Freeway


LLE SNAP Eligibility by Census Tract in Maricopa County
Legend
LLE SNAP Eligibility
0 - 499
500 - 1,499
1,500 - 2,999
3,000 - 6,200
Freeway
Rio Verde
Scottsdale
Carefree
Cave Creek
New River
Paradise Valley
Phoenix
Glendale
Sun City
Youngtown
El Mirage
Peoria
Sun City West
Surprise
Litchfield Park
Litchfield Park
Tolleson
Buckeye
Buckeye
Mesa
Tempe
Guadalupe
Avondale
Goodyear
Gilbert
Chandler
Sun Lakes
Queen Creek

V. RECOMMENDATIONS FOR SNAP OUTREACH

Drawing on the barriers presented in section III, best practices in SNAP outreach across the country, and additional comments by interviewed service providers and advocates, this project makes 20 recommendations for SNAP outreach improvement under the following four categories: (A) Join and Grow the Network, (B) Provide Relevant Information, (C) Employ Community-Based Messages and Media, and (D) Evaluate and Grow the Resource Pool. These steps are presented in the order in which they should be pursued and make up a continuous process of planning, action and evaluation:

Beneath each recommendation, the Fellow has provided a suggested outcome and suggested steps for implementation.

Though some of the barriers described in section III should also be addressed through local, state, and federal policy interventions, recommendations for policy change are outside the scope of this report. The recommendations that follow involve providing information, tools and other resources to LLEs in Arizona.

A. Join and Grow the Network

This project was conceived because, while ACAA has the desire and the financial and staff resources to improve SNAP outreach to Latino households across Arizona, it does not have the relationships with Latino-serving organizations and access to community knowledge to support such improvements. ACAA should convene a permanent guiding body to provide ongoing community input to SNAP improvements and actively include Latino voices in a conversation about vital services for Latino people. As the group convener, ACAA should cede power over most of the programmatic details of SNAP outreach to be provided and instead (1) convene interested parties to develop best practices in SNAP outreach to the LLEs in Arizona and (2) coordinate the provision of that outreach to reach the high opportunity areas. ACAA is well-positioned to be the convener because it has built a positive working relationship with DES and has the institutional knowledge and organizational capacity to perform grant reporting to USDA. ACAA is neutrally positioned to convene and

coordinate the efforts of a group of stakeholders with diverse interests. Finally, ACAA can combine efforts to provide outreach to LLEs in Arizona with efforts to provide outreach to other underserved groups to reach all likely eligible people in the state.

(1) Complete an internal assessment of limitations on coalition building with Latino organizations.

Outcome: ACAA is a transparent and equitable partner in a coalition composed primarily of Latino-serving organizations interested in improving SNAP outreach to LLEs in Arizona.

Strategy: (a) Consider how the limited list of allowable activities funded by the SNAP Information and Access Plan grant and ACAA's grant partnership with DES limits who ACAA can invite to the table and which invitees will be willing to participate in a coalition.

(b) Consider how ACAA's current and desired future political position limits the types of activities and relationships ACAA is willing to and able to pursue.

(2) Form a SNAP Outreach Coalition of resource and community partners.

Outcome: ACAA is part of a standing group of primarily Latino-serving organizations involved in a continuous process of improvement to SNAP outreach to LLEs in Arizona.

Strategy: (a) Identify and foster strategic relationships with five to ten well-connected Latino-serving organizations in Arizona to serve on a rotating steering committee for the coalition.

(b) Work with the steering committee members to identify broad coalition goals and to recruit resource partners and community partners to the coalition. Resource partners primarily lend material or financial resources, institutional support, and/or professional connections the coalition. Community partners primarily lend community perspective, community support and engagement, and on-the-ground feedback to the coalition

(c) Hold a visioning session(s) for the coalition and create relevant subcommittees to guide, complete, and evaluate ongoing work.

(d) Create timelines and processes for monitoring coalition progress toward achieving objectives.

B. Provide Relevant Information

Interviews with service providers revealed that most LLEs are aware that the government provides benefits to help low-income people buy food. In general, providing relevant information to Latino likely eligible people means proceeding under the assumption that these households need less programmatic information about what SNAP is and how it can be used and more tools to complete the various processes necessary to receive benefits. The SNAP Outreach Coalition ("the coalition") proposed above should provide tools that directly address barriers to SNAP participation by Latino households.

(3) Use consistent program names on all outreach and government documents.

Outcome: LLEs understand that SNAP is the new name for the Food Stamp Program and use the new name when talking about the program.

Strategy: (a) Promote "SNAP," a simple, memorable, nationally accepted acronym, as the program name to be used on all program materials published by ACAA and DES.

(b) Include a note on all program materials printed in the next few years reminding readers that SNAP is the new name for the Food Stamp Program.

(4) Provide simple, complete SNAP eligibility self-screening tools.

Outcome: LLE immigrants and members of LLE households that include immigrants have access to one tool that helps them accurately pre-screen their families for SNAP benefits.

Strategy: (a) Provide a hard copy pre-screening handout with basic eligibility rules, including a complete list of eligibility rules for immigrants in plain language.
(b) Include a clear statement that people born in the US who meet income and resource limits are likely eligible regardless of the birthplace and legal residency status of other household members.

(5) Provide materials to directly counter common program misperceptions.

Outcome: Misperceptions of SNAP currently common among LLE households are extinguished and replaced with widespread awareness of correct program information.

Strategy: (a) Provide a hard copy piece of outreach literature that directly counters misperceptions detailed in barriers 2, 3, 4, 5, 6, 7 and 10, above and lists ways interested families can learn more and take appropriate action steps.

(6) Provide a complete list of community-based application sites across Arizona.

Outcome: LLEs know that community based application sites exist, understand how the SNAP application process at a CBO application site differs from the process at a DES office, and have access to a resource to find a CBO application site near where they live.

Strategy: (a) Work with DES and AHCCCS to compile a list of all community-based SNAP application sites across Arizona that have staff available to assist the public.
(b) Make staff at these sites aware of federal drawdown funding available.
(c) Work with the coalition to determine how to publicize and/or distribute the resource to protect the staff and applicants at CBO sites.

(7) Provide outreach materials tailored to concerns of LLE mixed status households.

Outcome: LLE mixed status households have access to tools that help them pre-screen their families for benefits and complete the SNAP application process for LLE members without revealing the status of household members residing in the US illegally.

Strategy: (a) Provide a complete, hard copy pre-screening tool tailored to LLE mixed status households, including an explanation for how to calculate gross and net income for households in which members with income are not included in the applicant household.
(b) Provide a list of documents required to apply for SNAP, including qualifying identification for an applicant not included in the applicant household.
(c) Provide a simple, complete explanation of HB 2008, including what is and is not a "discovered violation" and the process that ensues if a government worker reports a family to immigration authorities.
(d) Provide tips and tools to help undocumented applicants protect their status while completing the SNAP application process for legally entitled household members

(8) Provide tools for responding to DES notifications and actions.

Outcome: LLEs have access to tools to help them understand and complete the steps required to adequately respond to DES notifications or appeal suspected wrongful actions.

Strategy: (a) Provide a toolkit for LLE applicant households with the plain language meaning of DES notifications and steps required to adequately respond to them.

(b) Provide a toolkit for LLE applicant households to appeal suspected wrongful action on their SNAP cases without accessing legal assistance.
(c) Work with Community Legal Services and Legal Aid to publicize their free legal services available for LLE SNAP applicants.

C. Employ Community-Based Messages and Media

The following recommendations synthesize advice from interviewed service providers and advocates on effectively communicating information to LLE audiences in Arizona. In general, service providers and advocates suggested ways to provide LLEs information using messages that are compelling to LLE communities, in language understandable to LLE individuals regardless of their level of literacy and English proficiency, and through channels that are trusted and accessible to LLEs despite the challenging environment for Latino immigrants and mixed status households in Arizona.

(9) Provide outreach materials in well-translated Spanish.

Outcome: Limited and Non English Proficient LLEs have access to all outreach materials in simple, correct Spanish.

Strategy: (a) Create a Spanish language version of all outreach materials that is entirely in Spanish or appears from front to back to be written entirely in Spanish (i.e. a brochure or flyer formatted to read entirely in Spanish from beginning to end and, when refolded, reads entirely in English from beginning to end).
(b) Make it clear from the cover of printed Spanish language materials that the information contained is written in Spanish.
(c) Use plain language and simple phrases and syntax accessible to readers with basic Spanish literacy skills.
(d) Have Spanish language outreach materials translated by a service referred to ACAA by a Latino-serving organization, and vet translated materials with a diverse range of Latino service providers and LLEs before printing.

(10) Use rights-based and family-focused messages and images.

Outcome: SNAP outreach materials targeted to LLE audiences use messages and media that have been effective in promoting similar programs to LLEs.

Strategy: (a) Provide SNAP outreach materials with rights-based messages. Interviewees provided examples, including:

- "This country owes SNAP benefits to eligible children."
- "If you ever worked or paid taxes, it is your right to receive SNAP."

(b) Provide SNAP outreach materials with family-focused messages. Interviewees provided examples, including:

- "I can be proud that I fed my family."
- "SNAP helps you provide for your family."

(c) Use images featuring Latino families eating healthy, traditional Latino foods together.

(11) Provide information in a question and answer or dialogue format.

Outcome: Outreach materials are structured to provide direct and complete responses to the most common questions about SNAP.

Strategy: (a) Provide printed information in a Frequently Asked Questions or Myths/Facts format.
(b) Structure radio and television PSAs as dialogues between two LLEs.

(c) Seek media opportunities through which a coalition spokesperson can engage in dialogue with a newscaster, talk show host, or individuals who calls into the program.

(12) Provide outreach materials in printed hard copy.

Outcome: Outreach materials are provided in the most accessible format for LLEs in Arizona.

Strategy: (a) Provide outreach materials in printed hard copy.

(b) Make printed outreach materials available in public locations with high LLE traffic. Interviewees suggested providing materials at emergency food sites, in supermarkets, in local newspapers, in neighborhood and CBO newsletters, in public schools and Head Start locations, in child care centers, and through canvassing.

(13) Use spokespeople who are well known and trusted by Latino communities.

Outcome: SNAP outreach messages and information are provided to LLEs through channels they trust.

Strategy: (a) Work with the coalition to identify spokespeople who are Latino, who are known by the LLEs in the local community, who are trusted members of well regarded organizations, and who speak clear and fluent Spanish.

(b) Interviewees suggested that trusted spokespeople who have been effective promoting SNAP or programs similar to SNAP include farm worker advocates and educators, labor union workers, *promotoras*, employees at free and low-cost legal service organizations, WIC providers, Spanish language television and radio personalities, the consulates of Mexico and Central and South American countries, leaders of Latino neighborhood coalitions, and local Latino politicians.

(14) Engage Spanish language media to win earned media coverage

Outcome: SNAP outreach messages and information are provided to LLEs through channels they trust.

Strategy: (a) Engage producers and editors at Spanish language media outlets in the coalition.

(b) Work with the coalition to create events or frame stories to earn media coverage in Spanish language outlets.

(15) Hold outreach sessions in familiar spaces with pre-existing groups.

Outcome: SNAP outreach messages and information are provided to LLEs in environments where they feel comfortable fully engaging with the material.

Strategy: (a) Work with coalition partners to provide SNAP outreach sessions to LLE groups that meet regularly in the space where that group normally meets.

(b) Interviewees suggested non-threatening environments such as women's "coffee chat" groups called *pláticas or cafecitos*; no-pressure, resource-rich environments like community health fairs; groups convened by *promotoras*; Parent Teacher Association (PTA) meetings or training sessions for public school parent coordinators; and church group meetings.

(16) Harness the power of word-of-mouth advertising.

Outcome: SNAP outreach messages and correct program information are provided in a way that is easy for LLEs to share among friends and neighbors.

Strategy: (a) Work with service providers in the coalition to identify community leaders and highly-connected LLE individuals in local communities and make extra effort to provide those individuals with compelling messages and correct information about SNAP.

(b) Provide interesting "sound bites" and written language that conveys vital and correct program information that is easy to share among friends and neighbors (e.g. using "Did you know?..." language on printed materials or in PSAs).

D. Evaluate and Grow the Resource Pool

In order to ensure coalition effectiveness in implementing the above recommendations and sustainability to pursue other activities on an ongoing basis, the coalition should regularly evaluate its efforts to achieve outreach goals, monitor the effectiveness and relevancy of outreach activities, and increase the amount and type of funding available to support the coalition.

(17) Apply for non-governmental funding to support coalition work.

Outcome: The coalition is funded to pursue any outreach activities it deems necessary for LLE communities and in a way that equitably distributes power among coalition members.

Strategy: (a) Work with coalition partners and organizations in their professional network to identify non-governmental funding sources to support coalition work.
(b) Apply for the funding jointly with interested coalition members.

(18) Re-evaluate barriers to participation on an ongoing basis.

Outcome: Coalition outreach efforts always respond to the most relevant and pressing barriers to SNAP participation by LLEs in Arizona.

Strategy: (a) At intervals to be determined by the coalition and in response to major changes in relevant policy, work with service provider coalition members to convene groups of LLEs to discuss barriers to SNAP participation.
(b) Work with coalition partners to redesign outreach efforts to respond directly to the barriers presented during listening sessions with LLEs.

(19) Measure LLE SNAP enrollment increases relative to benchmarks and controls.

Outcome: The coalition is aware of its progress toward achieving outreach goals and can demonstrate the effectiveness of its overall strategy in increasing SNAP participation in high opportunity areas.

Strategy: (a) Secure a source of ethnicity-specific SNAP enrollment data at DES. The public records request filed for this project was filled over one month after the filing date.
(b) Use US Census Bureau poverty information and DES SNAP enrollment data to check the SNAP participation gap and SNAP participation rates by geography against annual benchmarks. This is possible at the state and county levels on an annual basis using 1-year American Community Survey estimates. This is possible for smaller geographies every five years using 5-year American Community Survey estimates. See Appendix B for methods.
(c) Hire an evaluation firm to perform a statistical test to determine if the increase in Latino SNAP enrollment in each high opportunity area is significantly greater than the mean increase in Latino SNAP enrollment in surrounding geographies.

(20) Scale up the coalition and recruit new members from high opportunity areas.

Outcome: The coalition has on-the-ground contacts and community perspective to increase outreach in high opportunity areas across Arizona.

Strategy: (a) Work with existing coalition members to identify and recruit new coalition members from high opportunity areas as they change over time.

APPENDIX A | Limitations of Qualitative Data

Readers should interpret the qualitative data presented in the barriers and recommendations sections of this report with several limitations in mind. First, the interviewees were service providers and advocates rather than LLEs. Some of the interviewees reported using SNAP in the past or being likely eligible, but most interviewees were not likely eligible for SNAP. LLE views on the barriers to Latino SNAP participation and recommendations for outreach would likely differ somewhat from the views offered for this project by interviewed service providers and advocates.

Second, the interviewee cohort may not accurately represent all relevant service providers and advocates. Interviewees were often connected either personally or professional to one or more of the other interviewees because the contacts were gained through a "snowball sampling" method, whereby the Fellow asked each interviewee to provide relevant contacts for subsequent interviews. It is reasonable to assume that people who regularly interact with one another socially or professionally have more consistent views among them than among people who do not know one another. Additionally, the interviews were conducted primarily in English. Monolingual Spanish service providers and advocates may have offered different views than the views offered by English-speaking interviewees for this project. Furthermore, 28 out of 30 interviewees worked completely or primarily within Maricopa County. Though the barriers and recommendations offered do not seem to be geographically specific, views offered by service providers and advocates outside Maricopa County may differ somewhat from those provided for this report.

Third, interview responses may have been influenced by interviewer bias. The Fellow who conducted the interviews is a white female with intermediate Spanish proficiency, whereas many interviewees were bilingual Latino/a people. The apparent and perceived differences between the interviewee and interviewer may have resulted in less honest and less complete responses from interviewees.

Fourth, the number of interviews completed was too low to allow the Fellow to parse out the differences in experiences and views among Latino subgroups. For example, there were not enough interviews to allow the author to draw well substantiated conclusion about differences in SNAP participation barriers based on nationality. Additionally, the responses offered in some interviews made it difficult to understand which pieces of a LLE's identity were at play for different types of barriers. For example, when an interviewer reported that a monolingual Spanish, undocumented immigrant in her community did not realize his family was eligible for SNAP, it is hard to know which of those characteristics prevented the person from becoming aware or understanding that his household was eligible. Where it was clear, the report explicitly delineates between barriers experienced by all LLEs and barriers experienced only by some subgroups.

APPENDIX B | Quantitative Methods and Limitations

Method for Calculating Arizona State and County LLE SNAP Participation Gaps and Non-Participation Rates

This section of Appendix B describes the method used to calculate the LLE SNAP participation gaps and LLE SNAP non-participation rates for Arizona and Arizona's counties, as cited in this report. Both measures of SNAP participation are functions of the number of LLEs in a given geography and the number of Latino individuals enrolled in SNAP in that geography. The Fellow used 2005-2009 American Community Survey (ACS) estimates to estimate the number of Latino people eligible for SNAP based on the gross income limit (130% FPL); Latino individuals who met the gross income limit during 2005-2009 according to ACS data are referred to as LLEs throughout. The Fellow used data provided by a contact at DES to calculate the number of Latino individuals participating in SNAP in July 2010. To find the LLE SNAP participation gaps and LLE SNAP non-participation rates for Arizona and Arizona counties, one should follow the steps below for the state and each of the 15 counties.

Step 1: Estimate the number of income eligible LLEs using 5-year ACS estimates.

STEP	DESCRIPTION
1.1	Download data for the number of all people for whom poverty status is determined with income : poverty ratios <1.00 and <1.25 by selecting "Under .50," ".50 to .99," and "1.00 to 1.24" from "Ratio of Income to Poverty Level in the Past 12 Months," ACS Table C17002.
1.2	Add data from "Under .50" and ".50 to .99" from Step 1.1. This is the total number of people living below 100% FPL.
1.3	Add data from "1.00 to 1.24" to the result of Step 1.2. This is the total number of people living below 125% FPL.
1.4	Download data for the number of Latino people for whom poverty status is determined with income under 100% FPL by selecting "Income in the past 12 months below poverty level" from "Poverty Status in the Past 12 Months by Sex By Age (Hispanic or Latino)," ACS Table B17001I. This is the total number of Latino people with incomes under 100% FPL.
1.5	Divide the result of Step 1.4 by the result of Step 1.2. This is the proportion of all people living under 100% FPL who are Latino, which is a reasonable estimate for the proportion of all people living under 130% FPL who are Latino.
1.6	Multiply the result of Step 1.5 by the result of Step 1.3. This is an estimate of the number of Latino people living under 125% FPL
1.7	Multiply the result of Step 1.6 by 1.05, the ratio of the number of people living under 130% FPL to the number of people living under 125% FPL. This is the estimate of the number of Latino people living below 130% FPL who are therefore likely eligible for SNAP based on the gross income eligibility requirement.

Step 2: Calculate the number of Latino individuals enrolled in SNAP using DES enrollment data by ZIP code by ethnicity.

STEP	DESCRIPTION
2.1	Obtain DES data on SNAP enrollment by ZIP code by ethnicity. Aggregate the ZIP code-level enrollment numbers up to the desired geographic unit of analysis (state or county). This is the number of Latino individuals enrolled in SNAP.

Step 3: Calculate the LLE SNAP participation gap.

STEP	DESCRIPTION
3.1	Subtract the result of Step 2.1 from the result of Step 1.7. This is an estimate of the number of LLEs not enrolled in SNAP.

Step 4: Calculate the LLE SNAP non-participation rate.

STEP	DESCRIPTION
4.1	Divide the result of Step 3.1 by the result of Step 1.7. This is the proportion of LLEs not enrolled in SNAP.

Limitations of Arizona State and County LLE SNAP Participation Gaps and Non-Participation Rates

- Because ACS data are drawn from a sample of the total population, they are subject to margins of error that range in size. This limitation applies to all uses of ACS data.
- This analysis uses ACS estimates from 2005-2009 because poverty data by ethnicity is not available for highly localized geographies more frequently than every five years, and the Fellow wanted to use the same ACS dataset to estimate state, county, and ZIP code level SNAP participation gaps and non-participation rates. Using five-year estimates means poverty data are not as current as one-year estimates; specifically, the 5-year ACS poverty data includes almost three years of poverty data collected before the start of the most recent economic recession. Using older data likely underestimates poverty rates for Latino individuals, thereby underestimating the number of LLEs in 2010.
- Because income : poverty data is not available by ethnicity, this project uses the proportion of people under 100% FPL who are Latino as a proxy for the proportion of people under 130% FPL who are Latino. This assumption introduces some additional error.
- The Fellow applied a ratio of 1.05 to the number of Latino individuals living under 125% FPL to arrive at the number of Latino individuals living under 130% FPL. This is a national estimate derived from the DataFerret program provided by the US Census Bureau for data from 2006-2008. Because 1.05 is a national ratio and not an Arizona-specific ratio, and because it was derived from data from 2006-2008, it may introduce additional error.
- Because the data required to estimate resources and citizenship status by ethnicity for highly localized geographies is not available, and because the Fellow chose not to use more limiting factors to determine SNAP eligibility at the county and state levels than she could at the tract/ZIP code level, this project categorizes all Latino people living under 130% FPL as likely eligible for SNAP. Using the gross income limit as the only limiting factor for determining eligibility overestimates the number of LLEs, since they would also need to qualify based on resource limits, citizenship status, and other eligibility rules.
- Some people, such as senior citizens, may be eligible for SNAP even though they have incomes higher than 130% FPL. Ignoring expanded eligibility for these people slightly underestimates the number of LLEs.
- This report combines ACS poverty data gathered 2005-2009 with DES SNAP enrollment data current as of July 2010. Using data collected during different time periods limits the accuracy of the results because the data may measure characteristics of different populations; people sampled in the ACS population may have moved away, died, or increased their annual income above 130% FPL between the ACS data collection from 2005 to 2009 and the DES data collection in 2010.

Method for Calculating ZIP code LLE SNAP Participation Gaps and Non-Participation Rates

This section of Appendix B describes the method used to calculate the LLE SNAP participation gaps and LLE SNAP non-participation rates for all Arizona ZIP codes, as cited in this report. Both measures of SNAP participation are functions of the number of LLEs in a given geography and the number of Latino individuals enrolled in SNAP in that geography. The Fellow used poverty estimates from the 2005-2009 American Community Survey (ACS) by census tract, converted to year 2000 ZIP Code Tabulation Areas (ZCTA) using a correlation list from the Missouri Census Data Center, to estimate the number of Latino people eligible for SNAP based on the gross income limit (130% FPL) in each ZIP code in Arizona. ZCTAs are US Census Bureau boundaries that are roughly similar to US Postal Service ZIP codes; poverty data converted to ZCTA was applied to the ZIP code of the same 5-digit name without adjustment. The Fellow used SNAP enrollment data from July 2010 from a contact at DES to calculate the number of Latino individuals participating in SNAP in each ZIP code. To find the LLE SNAP participation gaps and LLE SNAP non-participation rates for all Arizona ZIP codes, one should follow the steps below for every census tract in Arizona.

Step 1: Estimate the number of income eligible LLEs for census tracts using 5-year ACS estimates.

STEP	DESCRIPTION
1.1	Download data for the number of all people for whom poverty status is determined with income : poverty ratios <1.00 and <1.25 by selecting "Under .50," ".50 to .99," and "1.00 to 1.24" from "Ratio of Income to Poverty Level in the Past 12 Months," ACS Table C17002.
1.2	Add data from "Under .50" and ".50 to .99" from Step 1.1. This is the total number of people living below 100% FPL.
1.3	Add data from "1.00 to 1.24" to the result of Step 1.2. This is the total number of people living below 125% FPL.
1.4	Download data for the number of Latino people for whom poverty status is determined with income under 100% FPL by selecting "Income in the past 12 months below poverty level" from "Poverty Status in the Past 12 Months by Sex By Age (Hispanic or Latino)," ACS Table B17001I. This is the total number of Latino people under 100% FPL.
1.5	Divide the result of Step 1.4 by the result of Step 1.2. This is the proportion of all people living under 100% FPL who are Latino, which is a reasonable estimate for the proportion of all people living under 130% FPL who are Latino.
1.6	Multiply the result of Step 1.5 by the result of Step 1.3. This is an estimate of the number of Latino people living under 125% FPL
1.7	Multiply the result of Step 1.6 by 1.05, the ratio of the number of people living under 130% FPL to the number of people living under 125% FPL. This is the estimate of the number of Latino people living below 130% FPL who are therefore likely eligible for SNAP based on the gross income eligibility requirement in each census tract in Arizona.

Step 2: Convert the number of LLEs by census tract to the number of LLEs by ZCTA.

STEP	DESCRIPTION
2.1	Download a correlation list that relates 2000 census tracts ("source geocodes") to 2000 5-digit ZCTAs ("target geocodes") in Arizona from http://mcdc2.missouri.edu/websas/geocorr2k.html. Choose weighting variable "population (2000 census)." The CSV file produced is "Sheet 1." The "tract to zcta5 alloc factor" indicates the proportion of the tract in that row that is located in the ZCTA in that row. For example, if the tract to zcta5 alloc factor is 0.5, half of the census tract listed in that row is located in the ZCTA listed in the same row. Assume that the population in each tract is evenly distributed across the tract, so, in the above case, half of the tract's population resides in the given ZCTA.

2.2	Cut and paste only the county, tract, and LLE estimate by tract found in Step 1.7 into a new spreadsheet. This is "Sheet 2."
2.3	Separately, sort Sheets 1 and 2 by tract. Cut and paste the entire contents of Sheet 1 next to columns in Sheet 2. Arrange the columns from Sheet 1 and Sheet 2 so that columns of tract numbers are next to one another.
2.4	Tracts are repeated several times in the correlation list because tracts are often split between many ZCTAs. The goal of this step is to copy and paste ACS poverty data for each tract next to every instance of that tract in the correlation list. To do this, create empty cells next to repeated tracts in the correlation list and fill them with the ACS poverty information for that tract. To do this for every tract for the entire state may take several hours.
2.5	Cut and paste the repeated ACS data into the same column as "values only."
2.6	Create a new column to hold the number of LLEs for each tract piece. This is "Column A." Multiply ACS estimates for LLEs in a given tract by the tract to zcta5 alloc factor across the row. Drag the equation down the length of Column A. This data represents the number of LLEs living in each piece of each tract in Arizona.
2.7	Sort the entire spreadsheet by ZCTA. Create a new column to hold the sums of LLEs in each tract piece that make up each ZCTA. This is "Column B." Most ZCTAs encompass parts of several tracts, so there will be several rows with LLE data for the same ZCTA. In the last cell of Column B before rows for a new ZCTA begin, enter "=sum(" and select all the cells in Column A that belong to the ZCTA. Type ")" and press "Enter" to close the formula. Repeat this step for every ZCTA in the state. This manual process may take several hours. These sums are the estimated LLE population in each ZCTA.
2.8	Cut and paste the data from Column B back into Column B as "values only" to preserve the data for sorting.

Step 3: Calculate the number of Latino individuals enrolled in SNAP using DES enrollment data by ZIP code by ethnicity.

STEP	DESCRIPTION
3.1	Obtain DES data on SNAP enrollment by ZIP code by ethnicity. Cut and paste columns with the county, ZIP code, and total Latino SNAP enrollment into a new spreadsheet. This is "Sheet 3."

Step 4: Calculate the LLE SNAP participation gap.

STEP	DESCRIPTION
4.1	Sort ZCTA LLE data in Sheet 2 by data in Column B and cut the county, ZCTA, and estimated LLE data for all rows with LLE data from Sheet 2 and paste it next to ZIP code SNAP enrollment data in Sheet 3. With only the pasted cells selected, sort ZCTA LLE data by ZCTA, ascending. Now selecting only the ZIP SNAP enrollment data, sort by ZIP, ascending. Rearrange columns so that the ZCTAs are next to the ZIPs. Manually match the ZCTA LLE data to the ZIP SNAP enrollment data by creating empty cells next to ZIP code data with no corresponding ZCTA data. The frequency with which ZIP code data has no matching ZCTA data depends on how similar the state's ZIP and ZCTA boundaries are and the number of new ZIP codes created between 2000 and the time the ZIP code data was collected.
4.1	Sort Sheet 3 by ZCTA. Cut all of the data for all ZIPs with no corresponding ZCTA data into another sheet , "Eliminated data," for further analysis at the conclusion of the process.
4.2	Create a new column, Column C, and create a formula in the first cell in Column C to subtract the ZIP code Latino SNAP enrollment data from the ZCTA LLE estimates. Drag the formula down the column. This is the LLE SNAP participation gap for every ZIP/ZCTA with both poverty and SNAP enrollment data in Arizona.

Step 5: Calculate the LLE SNAP non-participation rate.

STEP	DESCRIPTION
5.1	Create a new column, and create a formula in the first cell of the column to divide data in Column C by ZCTA LLE data in the same row. Drag the formula down the new column. This is the LLE SNAP non-participation rate for every ZIP/ZCTA in Arizona.

Limitations of Arizona ZIP code LLE SNAP Participation Gaps and Non-Participation Rates

The data used in this process is from the same ACS and DES datasets used to calculate state and county level SNAP participation statistics, so all of the limitations from the previous section apply to this process. In addition:

- Converting 2000 census tract-level poverty data to 2000 ZCTA-level data and relating it to SNAP enrollment data gathered by 2010 ZIPs requires that a significant amount of SNAP enrollment data be eliminated because it does not have corresponding poverty data. This is a result of the redrawing and creation of new ZIP codes in the state since 2000. The mismatch in geographic boundaries distorts the SNAP participation numbers for the remaining ZIPs and overestimates the SNAP participation gap overall because nearly all people under 130% FPL are accounted for under some ZIP, but many people enrolled in SNAP were eliminated during the process of matching ZIP and ZCTA data.
- The sampling errors for ACS census tracts are much larger relative to the collected data in comparison to state or county level data. In some cases, the statistical error inherent in sampling so sparsely in such small areas renders the census tract level data almost unusable, calling into question the integrity of ZCTA-level data based on manipulated tract data.

The Arizona Community Action Association (ACAA) is a 501(c)(3) mission-driven association created in 1967 to address poverty across Arizona by uniting communities to end poverty through community-based initiatives and solutions. Through a collaboration of 300 organizations and individuals, ACAA develops and implements strategies to address and ultimately eliminate poverty.

ACAA promotes self-sufficiency by working with Community Action Agencies statewide to provide the tools needed to become self sufficient. Our members' services include case management and emergency assistance for food, utilities, rent and eviction prevention, emergency shelter, financial assistance, resources, referrals and employment.

Find out more at www.azcaa.org or by calling (602) 604-0640.

Author Contact

Marie Lawrence, Bill Emerson National Hunger Fellow

mlawrence@hungercenter.org

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USDA Food Stamp Program Photo Gallery

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In addition, I want to express my sincerest appreciation and respect for the project's interviewees, whose contributions are synthesized in the barriers and recommendations sections of this report. I hope this piece of writing is an accurate reflection of the assets and opportunities in your communities and, in some small way, supports your admirable work standing with, serving, and advocating for marginalized groups in Arizona. This project draws on interviews with representatives from the following thirty organizations:

Arizona Bridge to Independent Living
Arizona First Things First
Asian Pacific Community in Action
Border Action Network
Cartwright Family Resource Center
Catholic Charities
Chicanos Por La Causa
Childhelp
Children's Action Alliance
Citizens to End Poverty
Community Food Bank
Community Legal Services
Golden Gate Community Center
Hernandez Lechner PLLC
Kingdom Communities of the Valley
La Frontera Arizona
My Sister My Friend
Neighborhood Ministries
New City Phoenix/Barrio Nuevo
Roman Catholic Diocese of Phoenix
Safety, Nutrition, Activity and Care for Kids
St. Luke's Health Initiative
St. Mary's Food Bank
Somos America/Respeto
Stand for Children
United Way of Tucson and Southern Arizona
Valle del Sol, Inc.
Valley Interfaith Project
Valley of the Sun YMCA
Wesley Community Center

III. BARRIERS TO LATINO PARTICIPATION IN SNAP

LLEs face myriad barriers to SNAP participation, though they vary significantly by geography and over time. In order to ascertain the place- and time-specific barriers faced by LLEs in Arizona in 2010, the Fellow held interviews with representatives from 30 Arizona-based organizations. Twenty-one of the organizations work directly with LLEs, and their interviewed representatives were loosely categorized as "service providers" here; nine of the organizations are made up of employees who work as advocates, grant administrators, or workers otherwise at least one administrative level removed from likely eligible people, and their interviewed representatives are loosely categorized as "advocates" here. Below are descriptions of the 14 most cited barriers to Latino SNAP participation as revealed through these interviews. The barriers can be understood in four distinct categories: (A) program and eligibility awareness, (B) fears and other personal barriers, (C) obstacles to application completion, and (D) response to follow-up from DES. The categories represent a chronological sequence of events necessary for successful SNAP enrollment: The applicant must be aware of the program, must overcome fears of applying, must fill out the application, and must successfully respond to any follow-up notifications from DES. Together, these barriers form the foundation for the recommendations that follow.

A. Program & Eligibility Awareness

(1) Poor Program Name Recognition

On October 1, 2008, the Food Stamp Program (FSP) was renamed the Supplemental Nutrition Assistance Program (SNAP). The federal name change was implemented pursuant to the 2008 Farm Bill and was meant to reflect "the program's recent modernization and greater focus on nutrition."[23] In response, Arizona DES named the state SNAP program "Nutrition Assistance," translated online as "*Asistencia Alimenticia."*[24] While program administrators and the state SNAP application are required to use the new state name and USDA-funded outreach providers are required to use the new federal name, there has been little change in common parlance among front-line service

23 U.S. Department of Agriculture, Economic Research Service, "Briefing Rooms Supplemental Nutrition Assistance Program (SNAP)," http://www.ers.usda.gov/Briefing/SNAP/ (accessed February 1, 2010).

24 Arizona Department of Economic Security, "Asistencia Alimenticia," https://www.azdes.gov/variant.aspx?id=5199 (accessed February 1, 2010).