

Final Report - Catalogue by Program New Americans Initiative Safety Net Research

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Appendices - Program/Issue/Recommendation Catalogue

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Appendix A: Supplemental Nutrition Assistance Program (SNAP)

This section discusses the issues (problems), current interventions, and recommendations (solutions) to address limitations of access to public benefits for New Americans.

The top two preferred access modes for New Americans when applying to SNAP was in-person (50%) and online (19%) according to respondents. In-person was the top preference mode for all Coloradans as well (46%) followed by over-the-phone (39%).

Based on the survey responses, SNAP is affected by all discussed barriers.

The findings also highlight that many of the barriers and issues are not unique to New American population in at least two directions: 1) Some barriers also affect the general population, thus, there is a potential for broader support in the legislature, and 2) in some instances, the barriers and issues are driven by the immigrant and refugee communities who have additional challenges, best exemplified by language barriers.

The majority of the responses indicated that county agencies and community-based organizations (CBOs) were not aware of any approaches have been implemented to remove obstacles for New Americans related to administrative burden and paperwork.

All of the solutions reported for New Americans were consistently rated as also applicable to all Coloradans (agreement range from 92 to 100%), except for the solutions related to mitigating rural issues where only half of the respondents thought the solutions would help all Coloradans.

Close to 45% of the responses also suggested that regular briefings on updates to SNAP federal and state laws as well as eligibility for safety net access would increase county agencies and CBOs capacity to serve New Americans.

A majority of respondents (58%) support additional targeted efforts to ensure New Americans have equitable access to SNAP services.

Below is an inventory of issues as well as solutions identified by the survey. Following the inventory are highlighted issues, actionable solutions, context for those solutions and, when possible, a list of other issues mitigated by the solution.

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
Language Access	
N=24	
<ol style="list-style-type: none"> 1. Lack of available in-person language translation assistance (interpreters) (92%) 2. Lack of available online language translation assistance (interpreters) (80%) 3. Lack of available over-the-phone language translation assistance (interpreters) (71%) 	<ol style="list-style-type: none"> 1. Provide multilingual language lines with real people (46%) 2. Offer multilingual translation options for online materials/applications (42%) 3. Increase partnerships with community-based organizations or other trusted messengers (42%) 4. Provide automated multilingual language lines (29%) 5. Other (please specify) (25%) 6. Provide on-site interpreters (17%)
Digital Literacy and Digital Access	
N=15	
<ol style="list-style-type: none"> 1. No access to a computer, such as a laptop or desktop computer (100%) 2. No access to the Internet (100%) 3. Difficulty navigating new online applications or other processes online (93%) 4. The combination of the needed skills of digital literacy and resources of digital access (93%) 5. Lack of an email account (87%) 6. Lack of understanding how to use the Internet (80%) 7. Lack of understanding how to use physical devices, such as phones and computers (80%) 8. No access to a mobile device (example: owning an iPhone or iPad or being able to regularly use one) (67%) 	<ol style="list-style-type: none"> 1. Provide clients with other ways to apply, such as in person or over the phone (60%) 2. Ensure that clients can access websites in languages besides English (53%) 3. Other (please specify) (40%) 4. Ensure websites are easy to navigate (20%) 5. Offer options to apply on a mobile phone, such as through a mobile-friendly website or with a mobile app (13%) 6. Provide computer access to clients to apply (13%)
Lack of Outreach	
N=5	
<ol style="list-style-type: none"> 1. Lack of partnerships with community-based organizations working with New Americans (100%) 2. Lack of data/information about what languages New Americans are speaking (80%) 3. Lack of data/information where communities of New Americans are located (60%) 	<ol style="list-style-type: none"> 1. Ensure program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices (80%) 2. Create outreach strategies that are designed with and for communities (60%) 3. Ensure partnerships with community-based organizations (40%)

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
	4. Ensure materials and technology tools are available in multiple languages (20%)
Administrative Burden & Paperwork	
N=7	
1. Lack of clear information that an applicant who is not eligible can apply on behalf of others (100%) 2. Requiring proof of a high school degree or similar documentation only available in the country of origin (43%)	More accurate and accessible information about SNAP benefits as well as more in-person support during non-business hours (43%)
Stigma and Lack of Trust in Government	
N=14	
1. Lack of trust in government and impacts on immigration (100%) 2. Stigma about receiving benefits (93%)	1. Collaborate with community-based organizations to perform outreach (64%) 2. Use outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights (43%) 3. Collaborate with trusted community leaders and members (29%) 4. Use social media to spread information (21%) 5. Host in-person events like resource fairs (14%) 6. Collaborate with schools to disseminate information to families (14%) 7. Removing confidential information from applications whenever possible (7%) 8. Explaining how sensitive information will be used (7%)
Rural/Urban Differences	
N=19	
1. Technology and Internet issues (79%) 2. Lack of transportation options (79%) 3. Limited understanding of how to use technology and the Internet (68%) 4. Lack of translation and interpreter resources (68%) 5. The political climate (47%) 6. Access to information (availability, eligibility, reapplication) about SNAP benefits (47%) 7. There is more stigma associated with receipt of benefits (42%)	1. Increasing ways to access services, which may include better transportation options or adding more locations in the community to apply or receive help (16%)

LANGUAGE BARRIERS

ISSUE: Lack of available in-person language translation assistance (interpreters) (92%)

CONTEXT: According to one study participant, "not all counties have on-site interpreters that can assist New Americans." According to the survey, 92% or higher of respondents across all programs indicated that lack of in-person language assistance was an issue. Another survey respondent said, "Lack of assistance in your native tongue is a breeding ground for misunderstanding next steps, expectations, etc." and another said, "Since we are a smaller community, the language barrier is more difficult as we do not have staff who can speak other languages and so we have to schedule interpreter, which delays the process."

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **providing (more) on-site interpreters**. Understanding that there are limited resources and the demands across counties may vary, we recommend **prioritizing which specific county offices** receive more interpreters and, to do this, we would first recommend a supply/demand study to determine the criteria for how to identify and effectively distribute more interpreters. Counties face a supply/demand problem in finding people who can speak the range of languages New Americans speak and getting those individuals to the locations when they are needed.

After the study, the criteria for prioritizing specific county offices could be based on the length of wait times (wait times defined as the amount of time it takes from requesting an interpreter to how long it takes to actually get that interpreter) for on-site interpreters across all offices as determined through a survey. Once an average wait time is established, the state could distribute interpreters based on some proportion of wait times exceeding the threshold average, for example, by 10%. The criteria could also be sourced from an explicit language access policy that sets a threshold, for example, 3% of limited English proficiency individuals within a given population, or the threshold could be a raw number.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

Code of Colorado Regulation 4.902.31 addresses the requirement for county SNAP offices to provide SNAP interpreter services. County offices are required to provide an interpreter or staff person fluent in the applicant's language to conduct pre-screening, assist with the application, and conduct the interview. However, *in-person* services are not required, and during COVID many county SNAP offices closed their office lobbies to in-person services. Now that county lobbies are reopening, counties should give priority to certain subpopulations for in-person services, including individuals who need interpreter services for their SNAP interview.

ISSUE: New Americans seek out in-person services generally due to the language barriers that exist throughout the system and the understanding that in-person services make them more comfortable communicating and perhaps receiving more application support.

CONTEXT: As one New American said in a focus group, "the offices are open only 8am-5pm but if you have to work then your only option is to do it online and if you can't work the online system then there is the problem." Though survey data shows New Americans and Coloradans both prefer in-person access the most, there's a much larger spread between in-person and the next closest preferred access mode for New Americans compared to Coloradans. The primacy for in-person services among New Americans as well as the apparent lack of digital access and limited digital literacy for this population means there is a need for more intentional design in office hours.

If New Americans don't have the skills or the access to use online platforms, then intentionally designing office hours is how to meet the New American need for services. According to an Urban Institute study, work obligations also resulted in logistical barriers to applying for and receiving public assistance services, with one service provider and community advocate commenting, "When we're open, they're working." To respond to this barrier, some agencies and community organizations provided alternative hours¹.

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **keeping some offices open past normal business hours**. To prioritize which offices stay open past normal business hours, further study could identify which communities have particularly high populations of New Americans and establish a threshold distance between those communities and the closest office. If no offices exist within the threshold distance, as might be the case with certain rural localities, the state could establish more formal, funded partnerships with more proximate community-based organizations to fill the gap.

If expanded office hours cannot be accommodated, the state should take special notice that explicitly funding partnerships with community-based organizations that work with New Americans is the best way to ensure these services are permanent, sustainable and above all, accessible. New Americans should not be forced to make a choice between work and receiving more personal guidance and language support in applying for benefits.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

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- Difficulty navigating new online applications or other processes online

¹ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

ADDITIONAL CONSIDERATIONS:

SNAP interviews must be conducted by a public employee, but SNAP outreach contracts can be used to provide application assistance outside of normal business hours and in multiple languages.

ISSUE: New Americans whose primary language is not English or Spanish are practically out of immediate options to obtain information or application support while using **automated county phone lines**. The issue exists across all programs within the study.

CONTEXT: New Americans in Colorado speak several languages other than English and Spanish. In most cases during the inspection of the automated phone lines, there would be an opportunity to connect to a third language but if there was a minor issue for the client with the connection, the client is sent back to the English menu. Thus preventing access to non-English or non-Spanish speakers.

ACTIONABLE SOLUTION: Colorado has an opportunity to meet the language needs of New Americans by **providing a full-service language line accessible to all Colorado residents that meet a distinct threshold language** in a county (New Americans and residents with distinct language preferences) across all the study programs by expanding multi-language options to its automated lines (particularly, when automation has become a standard in customer service). This will be a first-of-its-kind and very much welcome service for non-English speaking residents. While it is important to expand languages on the front-end customer service line, it is equally important that these changes are tested thoroughly so an individual speaking, Somalian for example, can conduct business from beginning to end without having to reconnect to the English menu or lose their placement in the queue.

Colorado can double down on facilitating access for New Americans if the language service allows an option for video conference. As reported consistently by New Americans and CBOs, New Americans, in most of their countries of origin, seek and apply for benefits in a one-on-one format, which a virtual conference line could do, since they could relate to someone who looks and has similar experiences, and, in addition, the virtual service allows for a culturally competent experience where New Americans can (virtually) interact with their interpreter and be fully immersed in accessing benefits/services. If this type of service were made available to New Americans, Colorado will become a leader in multilingual and cultural competency.

ADDITIONAL CONSIDERATIONS:

For SNAP, interpreters must be provided in any language if requested. This is a federal and state rule but excludes automated systems. Thus, if there is going to be a comprehensive effort, the state needs to change the rule language.

DIGITAL LITERACY & DIGITAL ACCESS BARRIERS

Below is a discussion of program-specific challenges with online applications and online access:

Colorado PEAK: Our team found the PEAK platform to be intuitively organized. PEAK offered friendly navigation features and integrated page translation (offering 20+ language options). The platform also included Spanish language pages (PEAK site proper/Application landing page). Printable applications were easily accessible (English/Spanish language only, and large-print English for visually impaired). Toll-free number listed for application assistance.

Access barriers include the requirement for email address/phone number to create new account; Social Security Number (SSN) required to apply and, if the user doesn't have one, the user must contact the local county office for assistance; the landing page takes the user to English-only pages (e.g., selecting "Find nearby resources and services" brings you to an English page even if the user is in the Spanish setting); SNAP and LEAP resources page only has Google Translate option in a small box at the top; and the "Get help applying" link brings the user to an English-only site.

SNAP: Our team found that the SNAP global access point (website) was intuitively organized and simple to navigate. Helpful features included frequently asked questions (FAQs) for further guidance and a Google Translate page integration that offered language access for 50+ languages. An application can be filled out and returned by mail, fax or in person.

Access barriers included SSN and email credential requirements for enrollment (To sign into Connecting Colorado, you must create a profile, and the only way to create a profile is to provide SSN and an email address: https://www.connectingcolorado.com/cgi-bin/q_app_new_begin); Printable application is available in only two languages (English/Spanish) and in large-print PDF (English) for individuals with visual impairments; Applicants can also call SNAP outreach partner Hunger Free Colorado, but their help line only offers options in English and Spanish.

For additional comments see PEAK above.

ISSUE: Study participants indicated that **difficulty navigating online applications or other processes online was an issue** for New Americans.

CONTEXT: According to one study participant, the state has "... built our systems without including these groups of people...patch them in with minimal effort." The Urban Institute² found that, despite efforts to translate materials across states, English dominated online portals and was typically required to navigate public agency web sites in each state they studied. During our mystery shopper activities, our team identified issues like how the PEAK platform benefits application landing page only has English and Spanish options for users or how the page requires several steps to find over-the-phone help to complete an application. Additionally, the page that appears after clicking the "Help" tab has broken links.

The Urban Institute also found in their study that immigrants from less developed countries tended to have minimal formal schooling and limited literacy. Such applicants must rely on secondhand interpretation of documents, which can prove difficult if not written (or translated) in plain language or paired with visual alerts or information. It's critical to note that linguistic accessibility approaches for New Americans will vary based on their own educational background. Interviews and survey data suggest differing literacy levels in English as well as on New Americans' own native tongue.

ACTIONABLE SOLUTION: The state should **conduct usability testing with New Americans of multiple linguistic backgrounds across state benefit application websites**, like PEAK, and this effort must include a plain language review. While the practice of usability testing itself does not typically involve a plain language review, it is clear that complex administrative language is as much a barrier for New Americans as lack of digital literacy in seeking benefits online. For New Americans of higher literacy levels, usability testing and plain language review of physical and digital content will be key, prior to translation. Some administrative jargon does not easily translate to other languages, so attempting to conduct a plain language review after translation will likely yield more confusion. During a usability test⁵, you will:

- Learn if participants are able to complete specified tasks successfully
- Identify how long it takes to complete specified tasks
- Find out how satisfied participants are with your Web site or other product
- Identify changes required to improve user performance and satisfaction
- Analyze the performance to see if it meets your usability objectives

Building usability into a Web site (or any product) is an iterative process. Consider these elements when budgeting for usability testing:

- **Time:** You will need to allow time for the usability specialist and the team to become familiar with the website, pilot test the user scenarios and run programming tests, analyze the data, write the report, and present the findings.
- **Recruiting Costs:** Consider how or where you will recruit your participants. You will either need to allow for staff time to recruit or engage a recruiting firm to schedule participants for you based on the requirements.

² Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

- **Participant Compensation:** If you will be compensating participants for their time or travel, factor that into your testing budget.

Plain language may include: using everyday language; where possible, images and slow-paced video/audio to assist with meaning; avoiding jargon; and being mindful of nuances of language.

In providing all documents online, state or county offices should be Section 508-compliant by offering Word and HTML options, since many portable document format (PDF) files cannot be read by screen reader software packages. All major screen reading packages (VoiceOver, NVDA, JAWS, and TalkBack) have, albeit buggy, translation functionality, but they cannot read the kind of image text that accompanies PDFs.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork #ruralurban differences #digitalliteracy

- The complexity of the application process and instructions is an obstacle for [PROGRAM]
- Lack of transportation options (in rural areas)

ADDITIONAL CONSIDERATIONS:

PEAK is the online application platform for CDSS programs. When New Americans say they have trouble using applications, most programs they're referring to are those supported on the PEAK platform.

The user can obtain an eligibility decision using PEAK, but the only language other than English available is Spanish and ways for a person who needs assistance in other languages is limited.

PEAK is managed by an enterprise-level agency created by Colorado several years ago and, though it does include programs from multiple state agencies, that effectively means there are multiple groups of different stakeholders depending on this platform for eligibility processes. The number of concerned stakeholders and the complexity of the system means improving PEAK would require considerable effort.

However, before the initiating agency or agencies get to the level of design changes necessary for improving usability, they need to choose whether they should make applications more accessible for New Americans or whether they should make the reading level low enough for the groups that are most vulnerable.

San Diego County has opted to pay community-based organizations to assist people with their online applications platform. If it is too impractical or too long range to do usability testing, Colorado could also invest more heavily in assistants, contracting specifically to target subpopulations of New Americans.

Though the counties probably have contracts with SNAP outreach contractors or immigrant-serving organizations already, this new effort would be more targeted about the New Americans who are represented, which might include developing "mom and pop" CBOs or forming more relationships with independent contractors who are proficient in English, skilled in navigating Colorado systems and can reach out to their own specific communities.

With an online application and a laptop or tablet, contractors or eligibility workers can go anywhere that has a Wi-Fi connection, which may include someone's home, a library or a grocery store, so they can assist with a PEAK application.

The best model for funding would be that of community assistors are trained in a range of programs, not just PEAK, and trained on how to teach those digital skills.

There are two options available to the state of Colorado: one short-term and the other long-term. The long-term option is usability testing coupled with expanding language options and adopting plain language. The short-term option is increasing the utilization of community members and CBOs to provide application assistance with housing voucher application platforms and the PEAK platform as it already exists.

ISSUE: Limited access to Internet or physical digital access

CONTEXT: Study participants highlighted that, even when they are digitally literate, there is limited ability to apply or submit materials because of the lack of available digital access. Study participants were aware of the availability of libraries or community centers to use computers. However, they pointed out the limited schedules or closed facilities, particularly during the COVID pandemic.

ACTIONABLE SOLUTION: Provide computer access to clients to apply. The recommendation is to increase access to and availability of public computers or kiosks. Due to the regular working hours of the public facilities, individuals who work and have long work commutes are out of options to use public computers. Like suggestions for a more flexible schedule of local agency offices, there is a need for flexible scheduling to access public computers in libraries and community centers. Placing kiosks that allow for applying for a variety of benefits (particularly, those benefits outside of PEAK, such as the Emergency Rental Assistance Program (ERAP) from Colorado's Department of Local Affairs) will increase access to public programs.

This challenge applies to any locality outside city areas, and it is critical for the rural communities where public digital resources are significantly scarce. The lack of access is particularly limiting for employment-related services, where there is a need for continuous use (daily) to comply with work search requirements and to submit resumes. Individuals without access are more likely to not comply with and fail to receive the benefits and services for which they otherwise are eligible.

ISSUE: Information and materials are not fully available in multiple languages, the translation is not culturally adequate, or there are gaps in the language translation.

CONTEXT: Reliance on Google Translate is partially effective for most languages. Translations of eligibility and how to apply using generic tools may provide potential applicants with a basic understanding of the program requirements, needs and issues.

ACTIONABLE SOLUTION: Ensure materials and technology tools are fully functional and available in multiple languages. It is important to understand that services such as "Google Translate" or similar tools do not help with "program lingo." Furthermore, State officials should keep in mind that New Americans may have low to very low literacy levels. Thus, a one-size-fits-all translation may not be effective in communicating the nuances of what is needed from applicants. Aside from the quality of the translation, there is still the issue of program lingo and the naming of forms and requirements that may not be easily translatable and may require a "cultural" translation. One example of this language gap is the word "recertification," which may not have a direct translation in many languages.

For effective access for individuals with Limited English Proficiency or those that require a complete immersed alternate language experience, agencies should conduct cultural and full experience language testing of their information and application site. Information and instructions for application should be available in the alternate language from beginning to end.

ADMINISTRATIVE BURDEN & PAPERWORK BARRIERS

ISSUE: At least 70% of the survey respondents agreed that the **complexity of the application process and instructions is an obstacle** for New Americans in accessing the respective programs. There is room for improvement to mitigate the confusion that surrounds the application process by improving how instructions are given to New Americans. Human services agencies have an opportunity to minimize the burden on New Americans to read lengthy documents and comply with requirements.

CONTEXT: According to the Center for Budget and Policy Priorities, text messaging is a low-cost and effective means of communicating with clients by sending reminders and other information to a client's mobile phone. Agencies may use a contracted service or capabilities within their own systems to send clients text messages at key points during their application or renewal process which would greatly facilitate instructions. Agencies might send

a text message reminding clients that their interview date is approaching, that verification documents are due, or that it is time to complete a renewal request.

Michigan tested a pilot project of how texting might help clients and caseworkers, with caseworkers sending personalized text messages to clients and clients asking questions and submitting paperwork. For cases involved in the pilot, the average time needed to reach an eligibility determination fell from 13 to 10 days and the approval rate rose from 53 to 67 percent³. While small in scope, the pilot offered helpful takeaways for agencies interested in text messaging, such as how camera phones make it easier for clients to submit documents, caseworkers providing specific and responsive guidance improves the accuracy of document submission, and faster feedback loops allow errors to be resolved in hours instead of days or weeks. Overall, the **process is simplified and customers get the benefits they need promptly**. While texting may be a helpful approach for reaching some New Americans of higher literacy levels, it's important for any agencies to consult with their legal departments to check federal and state regulations on privacy.

Instructions and deadlines around the application process and related letters are confusing. As one focus group participant put it, "time and timing the person to read the letter are part of the challenges as well...I have to end up with a pile of letters that no one can read and almost all of the letters have due dates." Using regular and translated texts (for example, around due dates) could make the application process and application content easier to absorb for New Americans. As one survey respondent said, "Relationships are important...the phone call needs to first be a text message with number they will call from, otherwise the New American will not pick up due to the number of solicitations and harassment phone calls they receive." Another respondent said, "Texting is the best with the R&I [Refugee and Immigrant] community." The survey also showed strong support for leveraging text message communication as an accessible and trustworthy approach for reaching New Americans. Focus group participants also reported ⁴.

Thus, texting seems to be a more accessible and more effective approach to reach New Americans than standard paper mail communications. At a minimum, the ability to quickly inform New Americans of critical deadlines or appointments can reduce the complexity of instructions around these programs and better avoid delays or denials due to missed information.

ACTIONABLE SOLUTION: Texting has the unique ability to provide clearer instructions to New Americans as they go through the complex application process. On low end of resource investment, texting can provide

³ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

⁴ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

digestible, text-sized brief content about program eligibility and information and key information about due dates, reminders or deadlines without sifting through lengthy paperwork.

The advantage of this level of texting, or, one-way specific applications, (i.e., texts *to* a client but not *from*), may involve sending notices of an appointment; reminders that verification documents are due; information about how to renew expiring benefits; updates on the status of their application and when to expect final notice.

On the high end of investment, texting can provide: a way for New Americans to ask questions; a way to more easily provide documents and meet verification requirements. Specific two-way applications might include: clients sending photos of key required verification documents, like a letter from an employer; clients could report a change to the agency, such as a new address; clients could request that the agency reschedule an appointment; caseworkers could quickly notify clients that additional documents are needed to determine eligibility, for example, if the client submitted the wrong pay stubs; or caseworkers could ask questions or request clarification from clients about unclear information. The initiating agency can give clients the opportunity to "opt in" to receiving text messages⁵. The opt-in message should:

- Identify which agency will send the messages
- State the general content of the communications (e.g., "Important notifications about your benefits")
- Mention the frequency of the messages
- Disclose that message and data rates may apply for receiving text messages
- Give clients a means to "opt out" of receiving messages in the future

Advice from those who have used text messaging for human services programs include:

- To avoid messages being treated with suspicion or viewed as spam, the first text message from an agency to a client should include the agency's name. It should also explain how the client can opt out of receiving further messages.
- Make text messages concise. Messages exceeding 140 characters become more than one text.
- Use plain text instead of HTML or rich text so clients without smartphones or those with limited data plans can receive texts.
- Where possible, include a telephone number or website for next steps when action is needed.
- Don't use text messaging to send information that isn't time-sensitive or doesn't require action.
- Be prepared to respond to reply texts. Or, if no staff are assigned to monitor and respond to text messages, a reply text should generate a standardized, automatic response referring the client to a customer service number.
- Evaluate privacy and security considerations if collecting clients' personal information via two-way text messaging.

ADDITIONAL CONSIDERATIONS:

⁵ Ibid.

The complexities of these programs make it difficult to create an automated system for verification. Though an automated system can be created to gather documents necessary for verification, the nuances and questions associated with the documents are not as easily automated. In the short term, it might be more effective to have an assistor work with clients.

Texting has been deployed in the field of health and human services in light of the knowledge of behavioral economics nudges and the understanding that trauma-informed care means using shorter instructions and pieces of content. It's important to apply these theories around behavioral economics, which may include: visual reminders that clearly communicate what you want someone to do, as well as the consequence of not doing it; color-coding priorities in materials (red, yellow, green), for example, if it is necessary to mail materials, the last item in the series of notices should be red. Occasionally, an obstacle surrounding implementing these systems for human services agencies are federal requirements around notifications. When implementing texting systems, human services agencies should remember that while texting cannot fully replace mailed notifications or what is prescribed in law, it can supplement them.

Especially for New Americans who may have left their country in a rush, it's up to each state agency to reflect on what paperwork and documentation is really necessary to collect and, if it is necessary, state agencies should research how they can get that documentation in something other than paper and minimize other associated burdens.

Across programs, the application process and accompanying instructions are confusing. The choice incumbent on agencies initiating change is either simplify the process for everyone or invest in more assistance for people who face particular challenges in gaining access. Unfortunately, the federal rules for SNAP and some housing programs make the process complex. Since Colorado has limits to what it can control, a short-term solution might be to invest in assistors.

STIGMA AND LACK OF TRUST IN GOVERNMENT

ISSUE: Lack of trust in government and impacts on immigration (100%)

CONTEXT: As one New American said in a focus group, "I never applied for Medicaid because many lawyers' advice was not to apply. There are contradictions, the new Americans are in the middle of the process and how do we know that the state is protecting us? How the state can guarantee that my personal information won't be accessed by immigration?" The chilling effect of public charge policy changes was devastating to New American public trust across the country but, given the complexity of immigration laws, a generic approach to disseminating information is not always appropriate. One idea to improve trust in immigrant communities is an information triage system, according to an Urban Institute study that looked at how to improve public trust with immigrant

communities in Las Vegas⁶. One model for the kind of content which could be distributed can be found on San Diego County's guidance page on accessing benefits and public charge⁷. This page contains guidance (in English, Spanish, Arabic and Vietnamese) about whether public charge policy applies to an applicant, enrolling children, immigrant rights to healthcare, the top 5 facts on public charge, and the "ABC's of public charge"; an intuitive guide on who public charge APPLIES to, which BENEFITS are considered, and the totality of CIRCUMSTANCES.

ACTIONABLE SOLUTION: Across most programs, respondents indicated **outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights** as a top helpful solution in addressing access issues due to stigma and lack of trust of government. To deploy this solution effectively, **the state should create an information triage system based on immigration status**. The state could implement a triage system where standard information goes to less-complicated immigration statuses, like green card holders or refugees, and people with more complicated statuses would receive more targeted information, like advice to seek an attorney. This information could be delivered by phone (for lower literacy New Americans) and by text (for higher literacy New Americans) in their corresponding languages. The exact content could follow the San Diego model and distribute more general information to all immigrants (such as the "Does public charge apply to me?" and "Top 5 facts on public charge" items) and more targeted, specific information based on immigration status and household composition (like "Enrolling children" and the "ABC's of public charge").

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork

- The complexity of the application process and instructions is an obstacle for (PROGRAM)

ADDITIONAL CONSIDERATIONS:

While there's nothing that prohibits a program from providing clear information about public charge and other policy rules, there isn't any specific funding stream to tap into for messaging in this regard.

Some instructive lessons have emerged from an Urban Institute study on messaging to immigrants in the Houston area. In Houston, representatives of some organizations said they had engaged their staffs in internal trainings on the public charge rule using national resources, such as materials from Protecting Immigrant Families. Additionally, some social service organizations have teamed up with legal service providers to bring attorneys onsite to answer clients' public charge questions. Other social service organizations have leveraged existing resources, such as local legal assistance hotlines, to provide information to immigrant families. Some lessons learned from the study included there is a need for a rapid response system. Some providers in the study suggested that having a large-scale plan for educating providers about changes, communicating with families about how they could be affected,

⁶ McTarnaghan, S., Allen, E. H., Caraveo, C. A., & Bernstein, H. (n.d.). *Supporting immigrant families in Las Vegas*. urban.org. Retrieved November 12, 2021, from https://www.urban.org/sites/default/files/publication/102569/supporting-immigrant-families-in-las-vegas_3.pdf.

⁷ San Diego County. (n.d.). *Public charge information*. Public Charge. Retrieved November 12, 2021, from https://www.sandiegocounty.gov/content/sdc/hhsa/programs/ssp/public_charge.html.

and advocating for the reversal of harmful policies would help them act quickly on issues that affect immigrant families.⁸

As for the content behind immigrant-specific information, the state needs to take responsibility at the top of that information tree, meaning the message needs to originate from the governor's office or the governor's cabinet and special attention must be given to ensure it is reliable.

For the purposes of SNAP, the funds would need to come through existing SNAP outreach contracts.

ISSUE: Across most programs, respondents noted that **lack of trust in government and impacts on immigration was an issue** for New Americans. This issue reflects a distinct lack of trusted messengers to mitigate any lack of trust and communicate needed information.

CONTEXT: According to the Urban Institute, most public agencies and CBOs actively worked to provide accurate information and correct misconceptions but advocates and service providers in each state also noted that some public agency employees promoted these misconceptions to discourage immigrant use of public programs. Additionally, the level of misinformation about programs among low-income noncitizens deters some families from seeking needed benefits, and immigrants often rely on social networks and word of mouth to learn about programs. This reliance on informal outreach networks can lead to pervasive misperceptions about how programs work and how to access them⁹.

ACTIONABLE SOLUTION: Counties or agencies looking to dispel misinformation about public benefits should **establish partnerships with trusted messengers by consulting the Welcoming America community engagement tool kit**, which is specialized for reaching out to refugees¹⁰. Exact tactics will depend on the goal and staffing capacity of the effort and the amount of resources available, but they all revolve around determining what collaboration means and collective goal setting. Community engagement is not undertaken to affirm the status quo, but rather to build the changed conditions necessary to achieve a collective goal that is bold and broad enough to provide mutual benefits for all in the defined communities.

⁸ Gonzalez, Dulce, et al. "Supporting Immigrant Families in Houston: Efforts to Reduce Chilling Effects around the Public Charge Rule at the Local Level." *Urban Institute*, Urban Institute, 16 July 2020, https://www.urban.org/research/publication/supporting-immigrant-families-houston/view/full_report.

⁹ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

¹⁰ Stein, Paul. "Building and Sustaining Community Collaborations for Refugee Welcome: A Community Engagement Toolkit." *Welcoming America*, Welcoming America, https://www.welcomingrefugees.org/sites/default/files/documents/resources/Community%20Engagement%20Webinar%20-%20FINAL_501.pptx.

The tool kit describes three platforms of engagement: inform, involve and invest. For counties or agencies just beginning this process within the inform platform, their first step might be connecting with contacts in multiple organizations representing siloed sectors along separate integration pathways to establish two-way channels for periodic communications and outreach that cultivates empathy. Next the effort would consist of building understanding and trust with other communities about their members, about the needs and strengths of the people they assist, about the differences and similarities in their organizational cultures, and about the constraints and flexibilities in their organizational mandates.

Receiving communities develop multiple points of contact to learn from a core group of refugee resettlement agencies about refugees as newcomer groups presenting specific needs, but these receiving community contacts do not assume leadership or decision making about refugees. Arriving and receiving communities begin to identify values and goals that they have in common. There are numerous points of entry for finding this common ground, none more important than another. The point could be a need for achieving family stabilization, a mandate to reach underserved communities, a call to welcome the stranger, a curiosity for cross-cultural learning, or an incident of anti-refugee bullying.

Some tactics within the inform platform might include:

- Perform a Strengths Weaknesses Opportunities and Threats (SWOT) analysis of internal organizational capacities to achieve characteristics of this platform
- Mapping networks for contacts for outreach and communications
- Contact prioritizing of the strategic importance and pace of outreach to mapped organizations
- Identifying a trusted convener and engaging to assist arriving communities to work together and speak with one voice
- Building trust of collaborators through mutual accountability and facilitated peer networking

ADDITIONAL CONSIDERATIONS:

For SNAP, agencies can use their SNAP outreach dollars for establishing more relationships with CBOs serving New Americans. The task for SNAP outreach is reprogramming these budgets to support the kind of relationships or outreach operations desired. Agencies can use their existing application assistance sites for SNAP and enhance the contracts so they're working with the kinds of trusted messengers whose mission is to serve New Americans.

LACK OF OUTREACH AND KNOWLEDGE OF SERVICES

ISSUE: Lack of partnerships with community-based organizations working with New Americans (100%)

CONTEXT: As one New American put it in a focus group, "The language barrier doesn't help already and on top of that they don't help you. Just explain to me how to do it, we don't know how to use a computer, we don't know the language and then get denial letters because we didn't do it right. I hope there is more staff that speak our language and to be more patient, we don't know how to do it and we need their support." However, it must be noted that hiring or contracting with individuals who can speak a language is not the same thing as hiring more interpreters. As one New American put it, "it doesn't bother me to help my people translating but my job is something else...the government needs to pay a fair amount to employees for their language services." According to an Urban Institute report, one health organization in Greene County, North Carolina, improved its rapport with immigrant clients by hiring staff that spoke immigrants' native languages and training them to understand the cultural backgrounds of their clients. As a result, the organization's rapport with the community and the number of clients it serves have grown over the years¹¹.

ACTIONABLE SOLUTION: Survey respondents said that a helpful solution for knowledge of services might include **ensuring program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices.** In practical terms, this might mean hosting in-person or virtual equity, diversity and inclusion (EDI) workshops, ensuring that bilingual staff is available or actively recruiting staff that represent New American communities. The state is certainly capable of hiring EDI consultants and facilitating virtual workshops but may have more difficulty altering hiring practices.

ADDITIONAL CONSIDERATIONS:

Since Colorado uses a county-administered system, the state has no control over county staffing. All the governor can do is encourage and provide resources or support the effort to hire staff that represent populations served. However, the governor could offer free EDI courses or procure consulting services and make them available to counties if they choose. The state is certainly able to create a curriculum on serving New Americans with sensitivity. However, due to the political climate around a move like this one, the counties that are least likely to have New Americans are equally unlikely to send staff to a hypothetical state EDI conference.

¹¹ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

Since Denver County has about 50% of the state's caseload in SNAP and TANF, they could serve as a major partner in this arena. If Denver County is on board with providing EDI training, the state would need to encourage the other counties to offer it.

RURAL/URBAN DIFFERENCES

ISSUE: Lack of transportation options (79%)

CONTEXT: Given the emphasis on in-person preferences and the geographical spread in rural areas, it's not surprising that lack of transportation would be an issue. A proposal that emerged from one of our focus groups seemed to bridge the transportation divide by offering mobile offices. One participant said that a helpful solution might be "something like mobile clinics, it worked for the vaccines...in the Mexican Consulate, they have mobile offices where they go to other cities to help with passport applications."

In Massachusetts, CBOs help gather applications and documents in program satellite offices located in hospitals, schools or juvenile courts. In this way, CBOs reinforce the efforts of eligibility workers, who can only be in these locations one day a week. According to an Urban Institute study, without dependable public transportation and training in navigating the public transportation system, immigrants were less able to control their day-to-day schedules, keep appointments with caseworkers, and meet work requirements for some public programs¹². To respond to this type of logistical barrier, some agencies and community organizations that facilitate family enrollment in Medicaid/CHIP and SNAP provided co-located services in convenient locations, including workplaces with many immigrant employees. Immigrant communities may include playgrounds, libraries, strip malls, public agencies, schools, grocery stores, and workplaces ranging from farms to factories and small businesses. Organizations not associated with social services—such as faith-based organizations, local businesses with extensive and regular contact with community members, and even housing developments with high concentrations of particular immigrant groups—can be effective settings for benefit program application, enrollment, and recertification¹³.

¹² Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

¹³ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from

ACTIONABLE SOLUTION: The state should implement mobile offices or outstationing of eligibility workers in key New American locations a certain number of days per month to mitigate transportation issues for New Americans in rural areas. Where the state can identify a steady stream of potentially eligible individuals, such as a specific hospital or grocery store that's favored by New Americans or a Hmong community center, outstationing eligibility workers can be effective. The state can implement a mobile office when New Americans don't occupy a single location in their work lives, as might be the case with migrant workers.

ADDITIONAL CONSIDERATIONS:

For SNAP, there is no requirement to see someone in person. Theoretically, access can happen over the phone, but that requires the client to at least have a phone because they will need to have an interview for SNAP.

Transportation to a county office would be necessary if a client doesn't want to wait for their EBT card, in which case a mobile van might be useful but only if it has the ability to issue EBT cards. This activity is not easy to do because of security requirements around the EBT card issuance process.

ISSUE: Across most programs, respondents noted that **technology and internet issues was a major issue** for New Americans in rural areas.

CONTEXT: The Digital Equity Act of 2021 creates an annual 125-million-dollar competitive grant program to support digital inclusion projects undertaken by individual groups, coalitions, or communities of interest. The Digital Equity Competitive Grant Program awards grants to eligible entities, including local governments, nonprofits, and community anchor institutions. These funds can be used for a variety of digital inclusion efforts, including, but not limited to, device distribution programs, digital literacy training, and digital navigation assistance.¹⁴ According to the Pew Center, eight in ten adults who live in rural communities say they use the internet on at least a daily basis. Yet adults who lived in rural areas were more likely to say lack of access to high-speed internet was a major problem in their local community. Similar rates of concern about access to high-speed internet were shared by rural adults in both lower- and higher-income households, as well as by those with various levels of educational attainment.¹⁵ One promising practice, which has emerged in rural localities in Maine and Oklahoma,

<https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

¹⁴ Huffman, Amy. "The Infrastructure Act and Digital Equity Act Passed ... Now What?" *National Digital Inclusion Alliance*, 16 Nov. 2021, <https://www.digitalinclusion.org/blog/2021/11/16/the-infrastructure-act-and-digital-equity-act-passed-now-what/>.

¹⁵ Vogels, Emily A. "Some Digital Divides Persist between Rural, Urban and Suburban America." *Pew Research Center*, Pew Research Center, 19 Oct. 2021, <https://www.pewresearch.org/fact-tank/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>.

are mobile hotspot lending programs operated out of libraries.¹⁶ One study on the Oklahoma pilot program found the program was highly popular and was reaching the target audience with one of the few complaints being there were not enough hotspots.¹⁷

ACTIONABLE SOLUTION: **The state or county should create a mobile hotspot lending program** by identifying existing CBOs serving rural New Americans and collaborate to provide guidance on how to craft a successful application and submit it to the National Telecommunications and Information Administration (NTIA). If the state can coordinate a joint effort between a network of CBOs and maximize the perceived impact of the grant, the single application may be seen more favorably than submitting multiple individual applications. If the grant is accepted, the coordinating agency can seek references and instructional guides on forms, templates and rental agreements from the Public Library Association's "Hotspot Playbook" web page.¹⁸

¹⁶ Strover Director, Sharon. "Reaching Rural America with Broadband Internet Service." *The Conversation*, 27 Aug. 2019, <https://theconversation.com/reaching-rural-america-with-broadband-internet-service-82488>.

¹⁷ "Building a Rural Library Hotspot Lending Program: Results from a One-Year Pilot." *The Journal of Extension (JOE)*, <https://archives.joe.org/joe/2019april/a2.php>.

¹⁸ Shofmann. "DigitalLead: Rural Libraries Creating New Possibilities." *Public Library Association (PLA)*, 7 May 2021, <https://www.ala.org/pla/initiatives/digitallead/hotspot-playbook>.

Appendix B: Temporary Assistance for Needy Families (TANF)

The top two preferred access modes for New Americans when applying to TANF was in-person (50%) and online (20%) according to respondents. In-person was the top preference mode for all Coloradans as well (36%), followed by over-the-phone (27%).

Less than one third of the respondents were aware of systematic efforts that have been made to specifically conduct outreach for New American clients for TANF.

Solutions to obstacles identified in this survey for New Americans were not seen necessarily as helpful for all Coloradans (agreement range from 44% to 100%). The solutions that have a reduced impact are associated with administrative burden (57%) and on rural access (44%).

Respondents seem to indicate that there is a potential gap in information regarding laws and status surrounding TANF. More than 65% of the respondents also suggested that regular briefings on updates to TANF federal and state laws as well as eligibility for safety net access would increase the capability of county agencies and CBOs to serve New Americans.

100% of respondents, the largest percentage among all programs discussed here, support additional targeted efforts to ensure New Americans have equitable access to SNAP services.

Below is an inventory of issues as well as solutions identified by the survey. Following the inventory are highlighted issues, actionable solutions, context for those solutions and, when possible, a list of other issues mitigated by the solution.

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
Language Access	
N=11	
<ol style="list-style-type: none">1. Lack of available in-person language translation assistance (interpreters) (100%)2. Lack of available online language translation assistance (interpreters) (82%)3. Lack of available over-the-phone language translation assistance (interpreters) (82%)	<ol style="list-style-type: none">1. Offer multilingual translation options for online materials/applications (50%)2. Increase partnerships with community-based organizations or other trusted messengers (50%)3. Provide multilingual language lines with real people (40%)4. Provide on-site interpreters (40%)5. Provide automated multilingual language lines (10%)

	6. Other (please specify) 10%
Digital Literacy and Digital Access	
N=13	
<ol style="list-style-type: none"> 1. No access to the Internet (92%) 2. Lack of an email account (92%) 3. No access to a computer, such as a laptop or desktop computer (85%) 4. No access to a mobile device (example: owning an iPhone or iPad or being able to regularly use one) (85%) 5. The combination of the needed skills of digital literacy and resources of digital access (85%) 6. Difficulty navigating new online applications or other processes online (77%) 7. Lack of understanding how to use physical devices, such as phones and computers (62%) 8. Lack of understanding how to use the Internet (61%) 	<ol style="list-style-type: none"> 1. Ensure that clients can access websites in languages besides English (50%) 2. Ensure websites are easy to navigate (36%) 3. Provide clients with other ways to apply, such as in person or over the phone (29%) 4. Offer options to apply on a mobile phone, such as through a mobile-friendly website or with a mobile app (29%) 5. Provide computer access to clients to apply (29%) 6. Other (please specify) (29%)
Lack of Outreach	
N=3	
<ol style="list-style-type: none"> 1. Lack of data/information about what languages New Americans are speaking (67%) 2. Lack of data/information where communities of New Americans are located (67%) 3. Lack of partnerships with community-based organizations working with New Americans (67%) 	<ol style="list-style-type: none"> 1. Ensure materials and technology tools are available in multiple languages (67%) 2. Create outreach strategies that are designed with and for communities (33%) 3. Ensure program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices (33%) 4. Ensure partnerships with community-based organizations (33%) 5. Conduct outreach through email, texting or digital outreach (33%)
Administrative Burden & Paperwork	
N=8	
<ol style="list-style-type: none"> 1. Lack of clear information that an applicant who is not eligible can apply on behalf of others (75%) 2. Requiring proof of a high school degree or similar documentation only available in the country of origin (75%) 	<ol style="list-style-type: none"> 1. Providing more in-person, relational support as well as providing or accepting more documents in non-English languages (38%)
Stigma and Lack of Trust in Government	
N=7	
<ol style="list-style-type: none"> 1. Lack of trust in government and impacts on immigration (100%) 2. Stigma about receiving benefits (100%) 	<ol style="list-style-type: none"> 1. Collaborate with community-based organizations to perform outreach (100%)

	<ol style="list-style-type: none"> 2. Use outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights (29%) 3. Collaborate with trusted community leaders and members (29%) 4. Collaborate with schools to disseminate information to families (29%) 5. Removing confidential information from applications whenever possible (14%) 		
Rural/Urban Differences			
N=18	<table border="1"> <tr> <td> <ol style="list-style-type: none"> 1. Lack of transportation options (83%) 2. Technology and Internet issues (72%) 3. Lack of translation and interpreter resources (56%) 4. The political climate (56%) 5. There is more stigma associated with receipt of benefits (44%) 6. Limited understanding of how to use technology and the Internet (44%) 7. Access to information (availability, eligibility, reapplication) about TANF benefits (44%) </td><td> <ol style="list-style-type: none"> 1. Reducing locational barriers by working with community partners and providing physical access locations at key New American community sites (e.g., specific grocery stores, neighborhoods) (22%) </td></tr> </table>	<ol style="list-style-type: none"> 1. Lack of transportation options (83%) 2. Technology and Internet issues (72%) 3. Lack of translation and interpreter resources (56%) 4. The political climate (56%) 5. There is more stigma associated with receipt of benefits (44%) 6. Limited understanding of how to use technology and the Internet (44%) 7. Access to information (availability, eligibility, reapplication) about TANF benefits (44%) 	<ol style="list-style-type: none"> 1. Reducing locational barriers by working with community partners and providing physical access locations at key New American community sites (e.g., specific grocery stores, neighborhoods) (22%)
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LANGUAGE BARRIERS

ISSUE: Lack of available in-person language translation assistance (interpreters) (100%)

CONTEXT: According to one study participant, "not all counties have on-site interpreters that can assist New Americans." According to the survey, 92% or higher of respondents across all programs indicated that lack of in-person language assistance was an issue. Another survey respondent said, "Lack of assistance in your native tongue is a breeding ground for misunderstanding next steps, expectations, etc." with another saying, "Since we are a smaller community, the language barrier is more difficult as we do not have staff who can speak other languages and so we have to schedule interpreter, which delays the process."

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **providing (more) on-site interpreters**. Understanding that there are limited resources and the demands across counties may vary, we recommend **prioritizing which specific county offices** receive (more) interpreters. To do this, we would first recommend a supply/demand study to determine the criteria for how to identify and effectively distribute more interpreters. Counties face a supply/demand problem in finding people who can speak the range of languages New Americans speak and getting those individuals to the locations when they are needed.

After the study, the criteria for prioritizing specific county offices could be based on the length of wait times (wait times defined as the amount of time from requesting an interpreter in person to how long it takes to actually get that interpreter) for on-site interpreters across all offices as determined through a survey. Once an average wait time is established, the state could distribute interpreters based on wait times that exceed the threshold average, by 10% for example. The criteria could also be sourced from an explicit language access policy that sets a threshold for limited English proficiency individuals within a given population, 3% for example, or the threshold could be a raw number.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

The same County offices that process TANF applications typically process SNAP applications, so similar interpreter services would be used for both programs. In TANF, the need is greater because there is an ongoing case management requirement related to the work program, increasing the need for interpreter services for each interaction with the welfare-to-work component of the program.

ISSUE: **New Americans seek out in-person services** generally due to the language barriers that exist throughout the system and the understanding that in-person services make them more comfortable communicating and perhaps receiving more application support.

CONTEXT: As one New American said in a focus group, "the offices are open only 8-5pm but if you have to work then your only option is to do it online and if you can't work the online system then there is the problem." Though survey data shows New Americans and Coloradans both prefer in-person access the most, the spread between in-person and the next closest preferred access mode for New Americans is much larger compared to Coloradans. The primacy for in-person services among New Americans, as well as the apparent lack of digital access and limited digital literacy for this population, means there is a need for more intentional design in office hours.

If New Americans don't have the skills or the access to use online platforms, then intentionally designing office hours is how to meet New Americans' need for services. According to an Urban Institute study, work obligations also resulted in logistical barriers to applying for and receiving public assistance services, with one service provider and community advocate commenting, "When we're open, they're working." To respond to this barrier, some agencies

and community organizations provide alternative hours¹⁹.

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **keeping some offices open past normal business hours**. To prioritize which offices stay open past normal business hours, further study could identify which communities have particularly high populations of New Americans and establish a threshold distance between those communities and the closest office. If no offices exist within the threshold distance, as might be the case with certain rural localities, the state could establish more formal, funded partnerships with more proximate community-based organizations to fill the gap.

If expanded office hours cannot be accommodated, the state should take special notice that explicitly funding partnerships with community-based organizations that work with New Americans is the best way to ensure these services are permanent, sustainable and above all, accessible. New Americans should not be forced to make a choice between work and receiving more personal guidance and language support in applying for benefits

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

TANF families are especially busy during the day if they are participating in the work program, so it's particularly important to provide after-hours options for renewing benefits and meeting monthly income reporting requirements.

ISSUE: New Americans whose primary language is not English or Spanish are practically out of immediate options to obtain information or application support while using **automated county phone lines**. The issue exists across all programs within the study.

CONTEXT: New Americans in Colorado speak several languages other than English and Spanish. In most cases during the inspection of the automated phone lines, there would be an opportunity to get connected to a third

¹⁹ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

language, but if there was a minor issue for the client to make the connection, the client is sent back to the English menu. Thus preventing access to non-English or non-Spanish speakers.

ACTIONABLE SOLUTION: Colorado has an opportunity to meet the language needs of New Americans by providing a full-service language line accessible to all Colorado residents that meet a distinct threshold language in a county (New Americans and residents with distinct language preferences) across all the study programs by expanding multi-language options to its automated lines (particularly, when automation has become a standard in customer service). This will be a first-of-its-kind and very much welcome service for non-English speaking residents. While it is important to expand languages on the front-end customer service line, it is equally important that these changes are tested thoroughly, so an individual speaking Somalian for example can conduct business from beginning to end without having to reconnect to the English menu or lose their place in the queue.

Colorado can double down on facilitating access for New Americans if the language service allows an option for video conference. As reported consistently by New Americans and CBOs, New Americans in most of their countries of origin seek and apply for benefits in a one-on-one format, which a virtual conference line could do since they could relate to someone whose looks and experiences are similar. In addition, the virtual service allows for a culturally competent experience where New Americans can (virtually) interact with their interpreter and be fully immersed in accessing benefits/services. If this type of service were made available to New Americans, Colorado will become a leader in multilingual and cultural competency.

DIGITAL LITERACY & DIGITAL ACCESS

Listed below is a discussion of program specific challenges with online applications and online access:

Colorado PEAK: Our team found the PEAK platform to be intuitively organized. PEAK offered friendly navigation features and integrated page translation (offering 20+ language options). The platform also included Spanish language pages (PEAK site proper/Application landing page). Printable applications were easily accessible (English/Spanish language only and large print English for individuals with visual impairments). Toll-free number listed for application assistance.

Access barriers include the requirement of an email address/phone number to create a new account; Social Security Number (SSN) required to apply and, if the user doesn't have one, the user needs to contact the local county office for assistance; Landing page can bring the user to English-only pages (e.g., selecting "Find nearby resources and services" goes to an English page even if the user is in the Spanish setting); SNAP and LEAP resources page only has Google Translate option in a small box at the top; "Get help applying" link brings the user to an English-only site.

TANF: Our team found that the TANF website had a transparent and simple-to-navigate access point. Helpful features included printable PDFs available in English/Spanish languages only and large print PDF (English) for individuals with visual impairments.

Access barriers included: lack of language options; email address/mobile number required to create new account

ADMINISTRATIVE BURDEN & PAPERWORK BARRIERS

ISSUE: At least 70% of the survey respondents agreed that the **complexity of the application process and instructions is an obstacle** for New Americans in accessing the respective programs. There is room for improvement to mitigate the confusion that surrounds the application process by improving how instructions are given to New Americans. Human services agencies have an opportunity to minimize the burden on New Americans to read lengthy documents and comply with requirements.

CONTEXT: According to the Center for Budget and Policy Priorities, text messaging is a low-cost and effective means of communicating with clients by sending reminders and other information to a client's mobile phone. Agencies may use a contracted service or capabilities within their own systems to send clients text messages at key points during their application or renewal process, which would greatly facilitate instructions. Agencies might send a text message reminding clients that their interview date is approaching, that verification documents are due, or that it is time to complete a renewal request.

Michigan conducted a pilot project to test how texting might help clients and caseworkers, with caseworkers sending personalized text messages to clients and clients asking questions and submitting paperwork. For cases involved in the pilot, the average time needed to reach an eligibility determination fell from 13 to 10 days and the approval rate rose from 53 to 67 percent²⁰. While small in scope, the pilot offered helpful takeaways for agencies interested in text messaging, including how camera phones make it easier for clients to submit documents, specific and responsive guidance from caseworkers improves the accuracy of document submission, and faster feedback loops allow errors to be resolved in hours instead of days or weeks. Overall, the **process is simplified and customers get the benefits they need promptly**. While texting may be a helpful approach for reaching some New Americans of higher literacy levels, it's important for agencies to consult with their legal departments to check federal and state regulations on privacy.

²⁰ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

Instructions and deadlines around the application process are confusing. As one focus group participant put it, "time and timing the person to read the letter are part of the challenges as well...I have to end up with a pile of letters that no one can read and almost all of the letters have due dates." Using regular and translated texts, for example, around due dates, could make the application process and application content easier to absorb for New Americans. As one survey respondent said, "Relationships are important...the phone call needs to first be a text message with number they will call from otherwise the New American will not pick up due to the number of solicitations and harassment phone calls they receive." Another respondent said, "Texting is the best with the R&I [Refugee and Immigrant] community." The survey also showed strong support for leveraging text message communication as an accessible and trustworthy approach for reaching New Americans. Focus group participants also reported using mobile phones or having regular access to mobile phones. According to the Center on Budget and Policy Priorities, over 90% of families making less than \$30,000 a year²¹.

Texting seems to be a more accessible and more effective approach to reach New Americans than standard paper mail communications. At a minimum, the ability to quickly inform New Americans of critical deadlines or appointments can reduce the complexity of instructions around these programs and better avoid delays or denials due to missed information.

ACTIONABLE SOLUTION: **Texting has the unique ability to provide clearer instructions** to New Americans as they go through the complex application process. On the low end of resource investment, texting can provide digestible, brief content about program eligibility and information and key information on due dates, reminders or deadlines without sifting through lengthy paperwork.

The advantage of this level of texting, or one-way specific applications, i.e., texts *to* a client, not *from*, may involve sending notices of an appointment, reminders that verification documents are due, information about how to renew expiring benefits, updates on the status of their application and when to expect final notice.

On the high end of investment, texting can provide a way for New Americans to ask questions, to more easily upload documents and meet verification requirements. Specific two-way applications may include: clients could send photos of key required verification documents, like a letter from an employer; clients could report a change to the agency, such as a new address; clients could request that the agency reschedule an appointment; caseworkers could quickly notify clients that additional documents are needed to determine eligibility, for example, if the client submitted the wrong pay stubs; or caseworkers could ask questions or request clarification from clients about unclear information. The initiating agency can give clients the opportunity to "opt in" to receiving text messages²². The opt-in message should:

²¹ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

²² Ibid.

- Identify which agency will send the messages
- State the general content of the communications (e.g., "Important notifications about your benefits")
- Mention the frequency of the messages
- Disclose that message and data rates may apply for receiving text messages
- Give clients a means to "opt out" of receiving messages in the future.

Advice from those who have used text messaging for human services programs include:

- To avoid messages causing suspicion or being viewed as spam, the first text message an agency sends to a client should include the agency's name. It should also explain how the client can opt out of receiving further messages.
- Make text messages concise. Messages exceeding 140 characters become more than one text.
- Use plain text instead of HTML or rich text so clients without smartphones or those with limited data plans can receive texts.
- Where possible, include a telephone number or website for next steps when action is needed.
- Don't use text messaging to send information that isn't time-sensitive or doesn't require action.
- Be prepared to respond to any reply texts. Or, if no staff are assigned to monitor and respond to text messages, reply texts should generate a standard, automatic response referring the client to a customer service number.
- Evaluate privacy and security considerations if collecting clients' personal information via two-way text messaging.

ADDITIONAL CONSIDERATIONS:

The complexities of these programs make it difficult to create an automated system for verification. Though an automated system can be created to gather up documents necessary for verification, the nuances and questions associated with the documents are not as easily automated. In the short term, it might be more effective to have an assistor work with clients.

Texting has been deployed in the field of health and human services in light of the knowledge of behavioral economics nudges and the understanding that trauma-informed care means providing shorter instructions and pieces of content. It's important to apply these theories around behavioral economics including: visual reminders that clearly communicate what you want someone to do and the consequence of not doing it; color-coding priorities in materials (red, yellow, green), so if materials need to mailed, the last item in the series should be red. Occasionally, an obstacle surrounding implementing these systems for human services agencies are federal requirements around notifications. When implementing texting systems, human services agencies should remember that, while texting cannot fully replace mailed notifications or what is prescribed in law, it can supplement them.

Especially for New Americans who may have left their country in a rush, it's up to each state agency to reflect on what paperwork and documentation is really necessary to collect and, if it necessary, state agencies should research how they can get that documentation as something other than paper and minimizing other associated burdens.

Monthly income reporting is a dynamic of TANF in Colorado, so one potential application may include sending out monthly texting reminders. If agencies have income reports due every month, that level of texting, i.e., monthly reminders, easily lends itself to automation without any complex algorithms.

STIGMA AND LACK OF TRUST IN GOVERNMENT

ISSUE: Lack of trust in government and impacts on immigration (100%)

CONTEXT: As one New American said in a focus group, "I never applied for Medicaid because many lawyers' advice was not to apply. There are contradictions, the new Americans are in the middle of the process and how do we know that the state is protecting us? How the state can guarantee that my personal information won't be accessed by immigration?" The chilling effect of public charge policy changes was devastating to New Americans' public trust across the country but, given the complexity of immigration laws, a generic approach to disseminating information is not always appropriate. One idea to improve trust in immigrant communities is an information triage system, according to an Urban Institute study that looked at how to improve public trust with immigrant communities in Las Vegas²³. One model for the kind of content which could be distributed can be found on San Diego County's guidance page on accessing benefits and public charge²⁴. This page contains guidance (in English, Spanish, Arabic and Vietnamese) on whether public charge applies to an applicant, enrolling children, immigrant rights to healthcare, top 5 facts on public charge and the "ABC's of public charge"; an intuitive guide on who public charge APPLIES to, which BENEFITS are considered, and the totality of CIRCUMSTANCES.

ACTIONABLE SOLUTION: Across most programs, respondents indicated that **outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights** as a top helpful solution in addressing access issues due to stigma and lack of trust of government and to deploy this solution effectively, **the state should create an information triage system based on immigration status**. The state could implement a triage system where standard information goes to less complicated immigration statuses, like green card holders or refugees, and people with more complicated statuses receive more targeted information, like advice to seek an attorney. This information could be delivered by phone (for lower literacy New Americans) and by text (for

²³ McTarnaghan, S., Allen, E. H., Caraveo, C. A., & Bernstein, H. (n.d.). *Supporting immigrant families in Las Vegas*. urban.org. Retrieved November 12, 2021, from https://www.urban.org/sites/default/files/publication/102569/supporting-immigrant-families-in-las-vegas_3.pdf.

²⁴ San Diego County. (n.d.). *Public charge information*. Public Charge. Retrieved November 12, 2021, from https://www.sandiegocounty.gov/content/sdc/hhsa/programs/ssp/public_charge.html.

higher literacy New Americans) in their corresponding languages. The exact content could follow the San Diego model and distribute more general information to all immigrants (like the "Does public charge apply to me?" and "Top 5 facts on public charge" items) and more targeted, specific information based on immigration status and household composition (like "Enrolling children" and the "ABC's of public charge").

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork

- The complexity of the application process and instructions is an obstacle for (PROGRAM)

ADDITIONAL CONSIDERATIONS:

While there's nothing that prohibits a program from providing clear information rules, there isn't any specific funding stream to tap into for messaging in this regard.

Some instructive lessons have emerged from an Urban Institute study on messaging to immigrants in the Houston area. In Houston, representatives of some organizations said they had engaged their staff in internal trainings on the public charge rule using national resources such as materials from Protecting Immigrant Families. Additionally, some social service organizations have teamed up with legal service providers to bring attorneys onsite to answer clients' public charge questions. Other social service organizations have leveraged existing resources, such as local legal assistance hotlines, to provide information to immigrant families. One lesson learned from the study was the need for a rapid response system. Some providers in the study suggested that having a large-scale plan for educating providers about changes, communicating with families about how they could be affected, and advocating for the reversal of harmful policies would help them act quickly on issues that affect immigrant families²⁵.

As for the content behind immigrant-specific information, the state needs to take responsibility at the top of that information tree, meaning the message needs to originate from the governor's office or the governor's cabinet and given special attention to ensure it is reliable.

ISSUE: Across most programs, respondents noted that **lack of trust in government and impacts on immigration was an issue** for New Americans. This issue reflects a distinct lack of trusted messengers to mitigate any lack of trust and communicate needed information.

CONTEXT: According to the Urban Institute, most public agencies and CBOs actively worked to provide accurate information and correct misconceptions but advocates and service providers in each state also noted that some public agency employees promoted these misconceptions to discourage immigrants' use of public programs. Additionally, the level of misinformation about programs among low-income noncitizens deters some families from seeking needed benefits, and immigrants often rely on social networks and word of mouth to learn about programs.

²⁵ Gonzalez, Dulce, et al. "Supporting Immigrant Families in Houston: Efforts to Reduce Chilling Effects around the Public Charge Rule at the Local Level." *Urban Institute*, Urban Institute, 16 July 2020, https://www.urban.org/research/publication/supporting-immigrant-families-houston/view/full_report.

This reliance on informal outreach networks can lead to pervasive misperceptions about how programs work and how to access them²⁶.

ACTIONABLE SOLUTION: Counties or agencies looking to dispel misinformation about public benefits should establish partnerships with trusted messengers by consulting the Welcoming America community engagement tool kit, which is specialized for reaching out to refugees²⁷. Exact tactics will depend on the goal and capacity of the effort and the resources available but they all revolve around determining what collaboration means and collective goal setting. Community engagement is not undertaken to affirm the status quo, but rather to build the changed conditions necessary to achieve a collective goal that is bold and broad enough to provide mutual benefits for all in the defined communities.

The tool kit describes three platforms of engagement: inform, involve and invest. For counties or agencies just beginning this process within the inform platform, their first step might be connecting with contacts in multiple organizations representing siloed sectors along separate integration pathways to establish two-way channels for periodic communications and outreach that cultivate empathy. Next the effort would consist of building understanding and trust with other communities about their members, about the needs and strengths of the people they assist, about the differences and similarities in their organizational cultures, and about the constraints and flexibilities in their organizational mandates.

Receiving communities develop multiple points of contact to learn from a core group of refugee resettlement agencies about refugees as newcomer groups presenting specific needs, but these receiving community contacts do not assume leadership or decision making about refugees. Arriving and receiving communities begin to identify values and goals that they have in common. There are numerous points of entry for finding this common ground, none more important than another. The point could be a need for achieving family stabilization, a mandate to reach underserved communities, a call to welcome the stranger, a curiosity for cross-cultural learning, or an incident of anti-refugee bullying.

Some tactics within the inform platform might include:

²⁶ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

²⁷ Stein, Paul. "Building and Sustaining Community Collaborations for Refugee Welcome: A Community Engagement Toolkit." *Welcoming America*, Welcoming America, https://www.welcomingrefugees.org/sites/default/files/documents/resources/Community%20Engagement%20Webinar%20-%20FINAL_501.pptx.

- Perform a Strengths Weaknesses Opportunities and Threats (SWOT) analysis of internal organizational capacities to achieve characteristics of this platform
- Mapping networks for contacts for outreach and communications
- Contact prioritizing of the strategic importance and pace of outreach to mapped organizations
- Identifying a trusted convener and engaging to assist arriving communities to work together and speak with one voice
- Building trust of collaborators through mutual accountability and facilitated peer networking

LACK OF OUTREACH AND KNOWLEDGE OF SERVICES

ISSUE: Lack of partnerships with community-based organizations working with New Americans (67%)

CONTEXT: As one New American put it in a focus group, "The language barrier doesn't help already and on top of that they don't help you. Just explain to me how to do it, we don't know how to use a computer, we don't know the language and then get denial letters because we didn't do it right. I hope there is more staff that speak our language and to be more patient, we don't know how to do it and we need their support." However, it must be noted that hiring or contracting with individuals who can speak a language is not the same thing as hiring more interpreters. As one New American put it, "it doesn't bother me to help my people translating but my job is something else...the government needs to pay a fair amount to employees for their language services." According to an Urban Institute report, one health organization in Greene County, North Carolina, improved its rapport with immigrant clients by hiring staff that spoke immigrants' native languages and training them to understand the cultural backgrounds of their clients. As a result, the organization's rapport with the community and the number of clients it serves have grown over the years²⁸.

ACTIONABLE SOLUTION: Survey respondents said that a helpful solution for knowledge of services might include ensuring program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices and in practical terms, this might mean hosting in-person or virtual equity, diversity and inclusion (EDI) workshops, ensuring that bilingual staff is available or actively recruiting staff that represent New American communities. The state is certainly capable of hiring EDI consultants and facilitating virtual workshops but altering hiring practices may be more difficult.

²⁸ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

ADDITIONAL CONSIDERATIONS:

Since Colorado uses a county-administered system, the state has no control of staffing in the various counties. All the governor can do is encourage and provide resources or support the effort to hire staff that represent populations served. However, the governor could offer free EDI courses or procure consulting services and make it available to counties if they choose. The state certainly has the ability to create a curriculum on serving New Americans with sensitivity. However, due to the political climate around a move like this one, the counties that are least likely to have New Americans are equally unlikely to send staff to a hypothetical state EDI conference.

Since Denver County has about 50% of the state's caseload in SNAP and TANF, they could serve as a major partner in this arena. If Denver County is on board with EDI training, the state would need to encourage the other counties to offer it.

RURAL/URBAN DIFFERENCES

ISSUE: Lack of transportation options (83%)

CONTEXT: Given the emphasis on in-person preferences and the geographical spread in rural areas, it's not surprising that lack of transportation would be an issue. One proposal that emerged from a focus group to bridge the transportation divide is offering mobile offices. As one participant said to describe this helpful solution, "Something like mobile clinics, it worked for the vaccines...in the Mexican Consulate, they have mobile offices where they go to other cities to help with passport applications...". In Massachusetts, CBOs help gather applications and documents in program satellite offices located in hospitals, schools or juvenile courts. In this way, CBOs reinforce the efforts of eligibility workers who can only be in these locations one day a week. According to an Urban Institute study, without dependable public transportation and training in navigating the public transportation system, immigrants were less able to control their day-to-day schedules, keep appointments with caseworkers, and meet work requirements for some public programs²⁹. To respond to this type of logistical barrier, some agencies and community organizations that facilitate families' enrollment for Medicaid/CHIP and SNAP provided co-located services in convenient locations, including workplaces with many immigrant employees. Immigrant communities may include playgrounds, libraries, strip malls, public agencies, schools, grocery stores, and workplaces ranging from farms to factories and small businesses. Organizations not associated with social services—such as faith-based organizations, local businesses with extensive and regular contact with community members, and even

²⁹ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

housing developments with high concentrations of particular immigrant groups—can be effective settings for benefit program application, enrollment, and recertification³⁰.

ACTIONABLE SOLUTION: The state should implement mobile offices or outstationing of eligibility workers in key New American locations a certain number of days per month to mitigate transportation issues for New Americans in rural areas. Where the state can identify a steady stream of potentially eligible individuals, like a specific hospital or grocery store favored by New Americans or a Hmong community center, outstationing eligibility workers can be effective. The state can implement a mobile office when New Americans don't occupy a single location in their work lives, as might be the case with migrant workers.

ADDITIONAL CONSIDERATIONS:

For TANF, workers tend to want to see clients in person and there may be a soft referral that happens after eligibility interview to the employment and training service. There could be assessments that happen subsequently that require the family to come in. For program services that require interviews, TANF support services will cover transportation services.

ISSUE: Across most programs, respondents noted that **technology and internet issues was a major issue** for New Americans in rural areas.

CONTEXT: The Digital Equity Act of 2021 creates an annual 125 million dollar competitive grant program to support digital inclusion projects undertaken by individual groups, coalitions, or communities of interest. The Digital Equity Competitive Grant Program awards grants to eligible entities, including local governments, nonprofits, and community anchor institutions. These funds can be used for a variety of digital inclusion efforts, including but not limited to device distribution programs, digital literacy training, and digital navigation assistance.³¹ According to the Pew Center, eight in ten adults who live in rural communities say they use the internet on at least a daily basis. Yet adults who lived in rural areas were more likely to say lack of access to high-speed internet was a major problem in their local community. Similar rates of concern about access to high-speed internet were shared by rural adults in both lower- and higher-income households, and by those with various levels of

³⁰ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

³¹ Huffman, Amy. "The Infrastructure Act and Digital Equity Act Passed ... Now What?" National Digital Inclusion Alliance, 16 Nov. 2021, <https://www.digitalinclusion.org/blog/2021/11/16/the-infrastructure-act-and-digital-equity-act-passed-now-what/>.

educational attainment.³² One promising practice which has emerged in rural localities in Maine and Oklahoma are mobile hotspot lending programs operated out of libraries.³³ One study of the Oklahoma pilot program found the program was highly popular and was reaching the target audience with one of the few complaints being there were not enough hotspots.³⁴

ACTIONABLE SOLUTION: The state or county should create a mobile hotspot lending program by identifying existing CBOs serving rural New Americans and collaborate to provide guidance on how to craft a successful application and submit it to the National Telecommunications and Information Administration (NTIA). If the state can coordinate a joint effort between a network of CBOs and maximize the perceived impact of the grant, the single application may be seen more favorably than submitting multiple individual applications. If the grant is accepted, the coordinating agency can seek references and instructional guides on forms, templates and rental agreements from the Public Library Association's "Hotspot Playbook" web page.³⁵

³² Vogels, Emily A. "Some Digital Divides Persist between Rural, Urban and Suburban America." *Pew Research Center*, Pew Research Center, 19 Oct. 2021, <https://www.pewresearch.org/fact-tank/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>.

³³ Strover Director, Sharon. "Reaching Rural America with Broadband Internet Service." *The Conversation*, 27 Aug. 2019, <https://theconversation.com/reaching-rural-america-with-broadband-internet-service-82488>.

³⁴ "Building a Rural Library Hotspot Lending Program: Results from a One-Year Pilot." *The Journal of Extension (JOE)*, <https://archives.joe.org/joe/2019april/a2.php>.

³⁵ Shofmann. "DigitalLead: Rural Libraries Creating New Possibilities." *Public Library Association (PLA)*, 7 May 2021, <https://www.ala.org/pla/initiatives/digitallead/hotspot-playbook>.

Appendix C: Child Care Assistance Program (CCAP)

The top preferred access modes for New Americans when applying to CCAP was in-person (37%), online (20%), and over-the-phone (20%) according to respondents. In-person was the top preference mode for all Coloradans as well (31%), followed by online (26%).

In this program, solutions to mitigate the access barriers for New Americans had potentially narrower effects for all Coloradans. Out of the barriers discussed in the assessment for CCAP, solutions to reduce rural access issues and administrative barriers were reported as the least transferrable to all Coloradans; 46% and 63% of respondents, respectively, said that the solutions would benefit all Coloradans.

The outreach efforts for CCAP seem to be unknown. Less than 15% of respondents were aware of systematic efforts made to specifically conduct outreach for New American clients for CCAP.

Over 65% of respondents stated that there is a need for briefings on law and regulation updates related to CCAP. Doing this seems to be a low-hanging fruit solution that will indirectly support access for New Americans.

Over 85% of respondents agreed that there should be targeted efforts to ensure New Americans have equitable access to CCAP services.

Below is an inventory of issues as well as solutions identified by the survey. Following the inventory are highlighted issues, actionable solutions, context for those solutions and, when possible, a list of other issues mitigated by the solution.

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
Language Access	
N=4	
1. Lack of available in-person language translation assistance (interpreters) 100% 2. Lack of available over-the-phone language translation assistance (interpreters) 100% 3. Lack of available online language translation assistance (interpreters) 75%	1. Provide multilingual language lines with real people (75%) 2. Provide automated multilingual language lines (25%) 3. Provide on-site interpreters (25%) 4. Offer multilingual translation options for online materials/applications (25%) 5. Increase partnerships with community-based organizations or other trusted messengers (25%) 6. Other (please specify) (25%)
Digital Literacy and Digital Access	
N=8	

<ol style="list-style-type: none"> 1. No access to a computer, such as a laptop or desktop computer (100%) 2. The combination of the needed skills of digital literacy and resources of digital access (100%) 3. Difficulty navigating new online applications or other processes online (100%) 4. Lack of an email account (88%) 5. No access to the Internet (88%) 6. No access to a mobile device (example: owning an iPhone or iPad or being able to regularly use one) (75%) 7. Lack of understanding how to use physical devices, such as phones and computers (75%) 8. Lack of understanding how to use the Internet (63%) 	<ol style="list-style-type: none"> 1. Ensure that clients can access websites in languages besides English (50%) 2. Ensure websites are easy to navigate (50%) 3. Provide clients with other ways to apply, such as in person or over the phone (38%) 4. Other (please specify) (38%) 5. Offer options to apply on a mobile phone, such as through a mobile-friendly website or with a mobile app (13%) 6. Provide computer access to clients to apply (13%)
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Lack of Outreach

N=4

<ol style="list-style-type: none"> 1. Lack of partnerships with community-based organizations working with New Americans (100%) 2. Lack of data/information about what languages New Americans are speaking (75%) 3. Lack of data/information where communities of New Americans are located (75%) 	<ol style="list-style-type: none"> 1. Ensure partnerships with community-based organizations (100%) 2. Create outreach strategies that are designed with and for communities (25%) 3. Ensure materials and technology tools are available in multiple languages (25%) 4. Ensure program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices (25%) 5. Conduct outreach through email, texting or digital outreach (25%)
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Administrative Burden & Paperwork

N=8

<ol style="list-style-type: none"> 1. Lack of clear information that an applicant who is not eligible can apply on behalf of others (75%) 2. Requiring proof of a high school degree or similar documentation only available in the country of origin (63%) 	<p>Improving transparency around requirements and due dates, which may include better notification about application status, follow-up phone calls, text reminders or walk-in availability for completing the application (38%)</p>
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Stigma and Lack of Trust in Government

N=4

<ol style="list-style-type: none"> 1. Lack of trust in government and impacts on immigration (75%) 2. Stigma about receiving benefits (75%) 	<ol style="list-style-type: none"> 1. Collaborate with community-based organizations to perform outreach (75%) 2. Host in-person events like resource fairs (25%) 3. Removing confidential information from applications whenever possible (25%)
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	<ol style="list-style-type: none"> 4. Use outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights (25%) 5. Removing confidential information from applications whenever possible (25%) 6. Use social media to spread information (25%)
Rural/Urban Differences	
N=13	<ol style="list-style-type: none"> 1. Lack of transportation options (77%) 2. Technology and Internet issues (69%) 3. Lack of translation and interpreter resources (62%) 4. Limited understanding of how to use technology and the Internet (54%) 5. Access to information (availability, eligibility, reapplication) about CCAP benefits (46%) 6. The political climate (38%) 7. There is more stigma associated with receipt of benefits (23%) <ol style="list-style-type: none"> 1. More staffing, which may include bilingual workers who better represent New Americans (31%)

LANGUAGE BARRIERS

ISSUE: Lack of available in-person language translation assistance (interpreters) (100%)

CONTEXT: According to one study participant, "not all counties have on-site interpreters that can assist New Americans." According to the survey, 92% or higher of respondents across all programs indicated that lack of in-person language assistance was an issue. A survey respondent said, "Lack of assistance in your native tongue is a breeding ground for misunderstanding next steps, expectations, etc." and another said, "Since we are a smaller community, the language barrier is more difficult as we do not have staff who can speak other languages and so we have to schedule interpreter, which delays the process."

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **providing (more) on-site interpreters**. Understanding that there are limited resources and the demands across counties may vary, we recommend **prioritizing which specific county offices** receive (more) interpreters. To do this, we would first recommend a supply/demand study to determine the criteria for how to identify and effectively distribute more interpreters. Counties face a supply/demand problem in finding people who can speak the range of languages New Americans speak and getting those individuals to the locations when they are needed.

After the study, the criteria for prioritizing specific county offices could be based the length of wait times (wait times defined as the amount of time it takes from requesting an interpreter in person to actually getting that interpreter) for on-site interpreters across all offices as determined through a survey. Once an average wait time is established,

the state could distribute interpreters based on a percentage of wait times being over the threshold average, 10% for example. The criteria could also be sourced from an explicit language access policy that sets a threshold for limited English proficiency individuals within a given population, 3% for example, or the threshold could be a raw number.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

The same county offices that process CCAP applications typically process SNAP applications, so similar interpreter services would be used for both programs. In CCAP, the need is greater because there is an ongoing case management requirement related to the work program, increasing the need for interpreter services for each interaction with the welfare-to-work component of the program.

ISSUE: New Americans seek out in-person services generally due to the language barriers that exist throughout the system and the understanding that in-person services make them more comfortable communicating and perhaps receiving more application support.

CONTEXT: As one New American said in a focus group, “the offices are open only 8-5pm but if you have to work then your only option is to do it online and if you can’t work the online system then there is the problem.” Though survey data shows New Americans and Coloradans both prefer in-person access the most, the spread between in-person and the next closest preferred access mode for New Americans is much larger compared to Coloradans. The primacy for in-person services among New Americans as well as the apparent lack of digital access and digital literacy necessarily (confirmed by focus group and survey data) means a need for more intentional design in office hours.

If New Americans don’t have the skills or the access to use online platforms, then intentionally designing office hours is how to meet their need for services. New Americans should not be forced to make a choice between work and receiving more personal guidance and language support in applying for benefits. According to the Urban Institute, work obligations also resulted in logistical barriers to applying for and receiving public assistance services with one service provider and community advocate commenting, “When we’re open, they’re working.” To respond to this barrier, some agencies and community organizations provided alternative hours³⁶.

³⁶ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **keeping some offices open past normal business hours**. To prioritize which offices stay open past normal business hours, further study could identify which communities have particularly high populations of New Americans and establish a threshold distance between those communities and the closest office. If no offices exist within the threshold distance, as might be the case with certain rural localities, the state could establish more formal, funded partnerships with more proximate CBOs to fill the gap.

If expanded office hours cannot be accommodated, the state should take special notice that explicitly funding partnerships with CBOs that work with New Americans is the best way to ensure these services are permanent, sustainable and above all, accessible.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

In order to be eligible for CCAP, adults must be working or participating in an approved employment and training program, so they are also especially busy during the day and need after-hours customer service options, just like TANF recipients.

ISSUE: New Americans whose primary language is not English or Spanish are practically out of immediate options to obtain information or application support while using **automated county phone lines**. The issue exists across all programs within the study.

CONTEXT: New Americans in Colorado speak several languages other than English and Spanish. In most cases during the inspection of the automated phone lines, there would be an opportunity to connect to a third language but if there was a minor issue for the client to make the connection, the client is sent back to the English menu. Thus preventing access to non-English or non-Spanish speakers.

ACTIONABLE SOLUTION: Colorado has an opportunity to meet the language needs of New Americans by **providing a full-service language line accessible to all Colorado residents that meet a distinct threshold language** in a county (New Americans and residents with distinct language preferences) across all the study

programs by expanding multi-language options to its automated lines (particularly, when automation has become a standard in customer service). This will be a first-of-its-kind and very much welcome service for non-English speaking residents. While it is important to expand languages on the front-end customer service line, it is equally important that these changes are tested thoroughly so an individual speaking Somalian, for example, can conduct business from beginning to end without having to reconnect to the English menu or lose their place in the queue.

Colorado can double down on facilitating access for New Americans if the language service allows an option for video conference. As reported consistently by New Americans and CBOs, New Americans, in most of their countries of origin, seek and apply for benefits in a one-on-one format, which a virtual conference line could do since they could relate to someone whose looks and experiences are similar. In addition, the virtual service allows for a culturally competent experience where New Americans can (virtually) interact with their interpreter and be fully immersed in accessing benefits/services. If this type of service were made available to New Americans, Colorado will become a leader in multilingual and cultural competency.

DIGITAL LITERACY & DIGITAL ACCESS BARRIERS

Listed below is a discussion of program specific challenges with online applications and online access:

Colorado PEAK: Our team found the PEAK platform to be intuitively organized. PEAK offered friendly navigation features and integrated page translation (offering 20+ language options). The platform also included Spanish language pages (PEAK site proper/Application landing page). Printable applications were easily accessible (English/Spanish language only, and large print English for individuals with visual impairments). Toll-free number listed for application assistance.

Access barriers include the requirement for email address/phone number to create a new account; Social Security Number (SSN) required to apply and, if the user doesn't have one, the user needs to contact the local county office for assistance; Landing page can bring the user to English-only pages (e.g., selecting "Find nearby resources and services" goes to an English page even if the user is in the Spanish setting); SNAP and LEAP resources page only has Google Translate option in a small box at the top; and "Get help applying" link brings the user to an English-only site.

CCAP: Our team found that CCAP offers access via PEAK, PDF forms in English or Spanish to mail/fax, and links to the local county department of human services.

Potential barriers include requiring email address and SSN to create an account (like other PEAK supported programs); also requires SSN or non-citizen document for applicant and dependents. Some more specific challenges we observed were:

- The childcare assistance page informs user about eligibility and program benefits in plain language and links to online application platform (PEAK), but there is no Spanish language option. However, there is a "Learn More" link that takes the user to a page with a Spanish option as well as non-online options for applying.
- While CCAP asks the user for a lot of information, much of it is not required to proceed through PEAK application to reach the final "Submit" page.
- If the user reaches the "Learn More" page and wants to contact the local DHS office, the Spanish translation option does not translate the clickable map but does translate the list of local DHS locations below the map.
- If the user signs in with Spanish and tries to continue an application, there is a glitch where the two options presented to the user (To submit or continue where the user left off) are in Spanish but the instructions around them are in English

ISSUE: Study participants indicated that **difficulty navigating online applications or other processes online was an issue** for New Americans.

CONTEXT: According to one study participant, the state has "... built our systems without including these groups of people...patch them in with minimal effort." The Urban Institute³⁷ found that, despite efforts to translate materials across states, English dominates online portals and was typically required to navigate public agency web sites in each state they studied. During our mystery shopper activities, our team identified issues like the PEAK platform benefits application landing page only offering English and Spanish language options or the user must follow several steps to find the over-the-phone help to complete an application. Additionally, the page that appears after clicking the "Help" tab has broken links.

The same study above also found that immigrants from less-developed countries tended to have minimal formal schooling and limited literacy. Applicants must rely on secondhand interpretation of documents, which can prove difficult if not written (or translated) in plain language or paired with visual alerts or information. It's critical to note that linguistic accessibility approaches for New Americans will vary based on their own educational background. Interviews and survey data suggest there are differing literacy levels in English as well as in New Americans' native tongues.

ACTIONABLE SOLUTION: The state should **conduct usability testing with New Americans of multiple linguistic backgrounds** across state benefit application websites, like PEAK, and this effort must include a plain language review. While the practice of usability testing itself does not typically involve a plain language review, it is clear that complex administrative language is as much a barrier for New Americans as the lack of digital literacy when seeking benefits online. For New Americans of higher literacy levels, usability testing and plain language

³⁷ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

review of physical and digital content prior to translation is key. Some administrative jargon does not easily translate to other languages, so attempting to conduct a plan language review after translation will likely yield more confusion. During a usability test⁵, you will:

- Learn if participants can complete specified tasks successfully;
- Identify how long it takes to complete specified tasks;
- Find out how satisfied participants are with your Web site or other product;
- Identify changes required to improve user performance and satisfaction; and
- Analyze the performance to see if it meets your usability objectives.

Building usability into a Web site (or any product) is an iterative process. Consider these elements when budgeting for usability testing:

- **Time:** You will need allocate sufficient time to plan the usability test, which includes allowing the usability specialist and the team to become familiar with the site, pilot test scenarios, run tests, analyze the data, write the report, and present the findings.
- **Recruiting Costs:** Consider how or where you will recruit your participants. You will either need to allow for staff time to recruit or engage a recruiting firm to schedule participants based on the requirements.
- **Participant Compensation:** If you will be compensating participants for their time or travel, factor that cost into your testing budget.

Plain language may include using everyday language and, where possible, images and slow-paced video/audio to assist with meaning; avoiding jargon; and being mindful of nuances of language.

In providing all documents online, state or county offices should be Section 508-compliant by offering Word and HTML options since many PDF files cannot be read by screen reader software packages. All major screen reading packages (VoiceOver, NVDA, JAWS, and TalkBack) have, albeit buggy, translation functionality, but they cannot read the kind of image text that accompanies PDFs.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork #ruralurbandifferences #digitalliteracy

- The complexity of the application process and instructions is an obstacle for (PROGRAM)
- Lack of transportation options (in rural areas)

ADDITIONAL CONSIDERATIONS:

PEAK is the online application for the programs administered by the Colorado Department of Social Services. When New Americans say they have trouble using applications, most programs they're referring to are supported on the PEAK platform

The user can get an eligibility decision through using PEAK but the only language available other than English is Spanish and there are limited ways to get help in other languages if a user needs assistance.

PEAK is managed by an enterprise level agency created by Colorado several years ago and though it does include programs from multiple state agencies, that effectively means there are multiple groups of different stakeholders

who dependend on it for eligibility processes. The number of concerned stakeholders as well as the complexity of the system means improving PEAK would require considerable effort.

However, before the initiating agency or agencies get to the level of design changes necessary for improving usability, they must decide whether they should make applications more accessible for New Americans or they should make the reading level low enough for the groups that are most vulnerable.

San Diego County opted to pay community organizations to assist people with their online applications platform. If it is too impractical or too long-range to do usability testing, Colorado could also invest in more assistors, contracting specifically to target subpopulations of New Americans.

Though the counties probably have contracts with outreach contractors or immigrant serving organizations already, this new effort would be more targeted about the New Americans represented, which might include developing "mom and pop" CBOs or forming more relationships with independent contractors who are proficient in English, skilled in navigating Colorado systems and can reach out to their own specific communities.

With an online application and a laptop or tablet, contractors or eligibility workers can go anywhere that has a Wi-Fi connection, which may include someone's home, a library or grocery store, so they can assist with a PEAK application.

The best model for funding would be that of community assistors trained in a range of programs, not just PEAK, and trained on how to teach use of those digital skills.

There are two options available to the state of Colorado: one short term and the other long term. The long-term option is usability testing coupled with expanding language options and adopting plain language. The short-term option is increasing the utilization of community members and CBOs to provide application assistance with housing voucher application platforms and the PEAK platform as it already exists.

ISSUE: Limited access to Internet or physical digital access

CONTEXT: Study participants highlighted that even when they are digitally literate, there is limited ability to apply or submit materials due to the lack of available digital access. Study participants were aware of the availability of libraries and community centers to use computers. However, they pointed out the limited schedule or closed facilities, particularly during the COVID pandemic.

ACTIONABLE SOLUTION: Provide computer access to clients to apply. The recommendation is to increase access to and availability of public computers or kiosks. Due to the regular working hours of the public facilities, individuals who work and have long work commutes are out of options for using public computers. Like suggestions for a more flexible schedule of local agency offices, there is a need for a flexible schedule to access public

computers in libraries and community centers. Placing kiosks that allow for applying for a variety of benefits (particularly those benefits not supported by PEAK, the Emergency Rental Assistance Program from the Colorado Department of Local Affairs for example) will increase access to public programs.

The challenge applies to any locality outside city areas, and it is critical for the rural communities where public digital resources are significantly scarce. The lack of access is particularly limiting in relation to employment-related services where there is a need for continuous use (daily) to comply with work search requirements and to submit resumes. Individuals are more likely to not comply with and fail to receive the benefits and services for which they are eligible.

ISSUE: Information and materials are not fully available in multiple languages, translations are not culturally adequate or there are gaps in the language translation.

CONTEXT: Reliance on Google Translate is partially effective for most languages. Translations of eligibility rules and how to apply by using generic tools may provide potential applicants with a basic understanding of program requirements, needs and issues.

ACTIONABLE SOLUTION: Ensure materials and technology tools are fully functional and available in multiple languages. It is important to understand that "Google Translate" or similar translation tools do not help with "program lingo". Furthermore, State officials should keep in mind that New Americans may have low to very low literacy levels. Thus, a one-size-fits-all translation may not be effective in communicating the nuances of what is needed from applicants. Aside from the quality of the translation, there is still the issue of program lingo and the naming of forms and requirements that may not be easily translatable and may require a "cultural" translation. One example of this language gap is in the word "recertification" which may not have a direct translation in many languages.

For effective access for individuals with Limited English Proficiency or those that require a complete immersed alternate language experience, agencies should see to a cultural and full experience language testing of their information and application site. Information and instructions for application should be available in the alternate language from beginning to end.

ADMINISTRATIVE BURDEN & PAPERWORK BARRIERS

ISSUE: At least 70% of the survey respondents agreed that the **complexity of the application process and instructions is an obstacle** for New Americans in accessing the respective programs. There is room for improvement to mitigate the confusion that surrounds the application process by improving how instructions are given to New Americans. There's an opportunity for human services agencies to minimize burden on New Americans to read lengthy documents and be compliant with requirements.

CONTEXT: According to the Center for Budget and Policy Priorities, text messaging is a low-cost and effective means of communicating with clients by sending reminders and other information to a client's mobile phone. Agencies may use a contracted service or capabilities within their own systems to send clients text messages at key points during their application or renewal process which would greatly facilitate instructions. Agencies might send a text message reminding clients that their interview date is approaching, that verification documents are due, or that it is time to complete a renewal.

In Michigan, a pilot project tested how texting might help clients and caseworkers, with caseworkers sending personalized text messages to clients and clients asking questions and submitting paperwork. For cases involved in the pilot, the average time needed to reach an eligibility determination fell from 13 to 10 days and the approval rate rose from 53 to 67 percent³⁸. While small in scope, the pilot offered helpful takeaways for agencies interested in text messaging like how camera phones make it easier for clients to submit documents, specific and responsive guidance from caseworkers improves the accuracy of document submission, and faster feedback loops allow errors to be resolved in hours, instead of days or weeks. Overall, the **process is simplified and customers get the benefits they need and promptly**. While texting may be a helpful approach for reaching some New Americans of higher literacy levels, it's important for any agencies to consult with their legal departments to check federal and state regulations on privacy.

As one focus group participant put it, "time and timing the person to read the letter are part of the challenges as well...I have to end up with a pile of letters that no one can read and almost all of the letters have due dates." If instructions and deadlines around the application process are confusing, regular and translated texts (for example, around due dates) could make the application process and application content easier to absorb for New Americans. As one survey respondent said, "Relationships are important...the phone call needs to first be a text message with number they will call from otherwise the New American will not pick up due to the number of solicitations and harassment phone calls they receive." Another respondent said, "Texting is the best with the R&I [Refugee and Immigrant] community." The survey also showed strong support for leveraging text message communication as an

³⁸ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

accessible and trustworthy approach for reaching New Americans. Focus group participants also admitted using mobile phones or having regular access to mobile phones. According to the Center on Budget and Policy Priorities, over 90% of families making less than \$30,000 own a mobile phone and smart phone owners use text messaging more than any other feature or app³⁹.

Texting seems to be a more accessible and more effective approach to reach New Americans than standard paper mail communications. At a minimum, the ability to quickly inform New Americans of critical deadlines or appointments can reduce the complexity of instructions around these programs and better avoid delays or denials due to missed information.

ACTIONABLE SOLUTION: Texting has the unique ability to provide clearer instructions to New Americans as they go through the complex application process.

On the low end of resource investment, texting can provide digestible, brief content about program eligibility and information as well as key information on due dates, reminders or deadlines without sifting through lengthy paperwork. The advantage of this level of texting (one-way specific applications, i.e., texts *to* a client, not *from*), may include sending notices of an appointment, reminders that verification documents are due, information about how to renew expiring benefits, updates on the status of their application and when to expect final notice.

On the high end of investment, two-way texting can provide a way for New Americans to ask questions; more easily upload documents and meet verification requirements. Specific two-way applications may include clients sending photos of key required verification documents, like a letter from an employer; clients reporting a change to the agency, such as a new address; clients requesting that the agency reschedule an appointment; caseworkers could quickly notify clients that additional documents are needed to determine eligibility, for example, if the client submitted the wrong pay stubs; or caseworkers could ask questions or request clarification from clients about unclear information. The initiating agency can give clients the opportunity to "opt in" to receiving text messages⁴⁰.

The opt-in message should:

- Identify which agency will send the messages;
- State the general content of the communications (e.g., "Important notifications about your benefits");
- Mention the frequency of the messages;
- Disclose that message and data rates may apply for receiving text messages; and
- Give clients a means to "opt out" of receiving messages in the future.

Advice from those who have used text messaging for human services programs include:

³⁹ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

⁴⁰ Ibid.

- To avoid suspicion or being viewed as spam, the first text message an agency sends to a client should include the agency's name. It should also explain how the client can opt out of receiving any further messages.
- Make text messages concise. Messages exceeding 140 characters become more than one text.
- Use plain text instead of rich text or HTML text so clients without smartphones or those with limited data plans can receive texts.
- Where possible, include a telephone number or website for next steps when action is needed.
- Don't use text messaging to send information that isn't time-sensitive or doesn't require action.
- Be prepared to respond to any reply texts. Or, if no staff are assigned to monitor and respond to text messages, reply texts should generate a standard, automatic response referring the client to a customer service number.
- Evaluate privacy and security considerations if collecting clients' personal information via two-way text messaging.

ADDITIONAL CONSIDERATIONS:

The complexities of these programs make it difficult to create an automated system for verification. Though an automated system can be created to gather up documents necessary for verification, the nuances and questions associated with the documents are not as easily automated. In the short-term, it might be more effective to have an assistor working with clients.

Texting has been deployed in the field of health and human services in light of the knowledge of behavioral economics' nudges and the understanding that trauma-informed care means shorter instructions and pieces of content. It's important to apply these theories around behavioral economics and they may include: visual reminders that clearly communicate what you want someone to do as well as the consequence of not doing it; color coding priorities in materials (red, yellow, green) so if materials need to mailed, the last item in the series should be red. Occasionally, an obstacle surrounding implementing these systems for human services agencies are federal requirements around notifications. When implementing texting systems, human services agencies should remember that while texting cannot fully replace mailed notifications or what is prescribed in law, it can supplement them.

Especially for New Americans who may have left their country in a rush, each state agency must decide what paperwork and documentation is really necessary to collect and, if it is necessary, state agencies should research how they can get that documentation as something other than paper and minimizing associated burdens.

STIGMA AND LACK OF TRUST IN GOVERNMENT

ISSUE: Lack of trust in government and impacts on immigration (75%)

CONTEXT: As one New American said in a focus group, "I never applied for Medicaid because many lawyers' advice was not to apply. There are contradictions, the new Americans are in the middle of the process and how do we know that the state is protecting us? How the state can guarantee that my personal information won't be accessed by immigration?" The chilling effect of public charge was devastating to New American public trust across the country but given the complexity of immigration laws, a generic approach to disseminating information is not always appropriate. One idea to improve trust in immigrant communities is an information triage system, according to an Urban Institute study that looked at how to improve public trust with immigrant communities in Las Vegas⁴¹. One model for the kind of content which could be distributed can be found on San Diego County's guidance page on accessing benefits and public charge⁴². This page contains guidance (in English, Spanish, Arabic and Vietnamese) on whether public charge applies to an applicant, enrolling children, immigrant rights to healthcare, top 5 facts on public charge and the "ABC's of public charge"; an intuitive guide on who public charge APPLIES to, which BENEFITS are considered, and the totality of CIRCUMSTANCES.

ACTIONABLE SOLUTION: Across most programs, respondents indicated that **outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights** as a top helpful solution in addressing access issues due to stigma and lack of trust of government and to deploy this solution effectively, **the state should create an information triage system based on immigration status**. The state could implement a triage system where standard information goes to less complicated immigration statuses, like green card holders or refugees, and people with more complicated statuses receive more targeted information, like advice to seek an attorney. This information could be delivered by phone (for lower literacy New Americans) and by text (for higher literacy New Americans) in their corresponding languages. The exact content could follow the San Diego model and distribute more general information to all immigrants (like the "Does public charge apply to me?" and "Top 5 facts on public charge") and more targeted, specific information based on immigration status and household composition (like "Enrolling children" and the "ABC's of public charge").

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork

- The complexity of the application process and instructions is an obstacle for (PROGRAM)

⁴¹ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

⁴² San Diego County. (n.d.). *Public charge information*. Public Charge. Retrieved November 12, 2021, from https://www.sandiegocounty.gov/content/sdc/hhsa/programs/ssp/public_charge.html.

ADDITIONAL CONSIDERATIONS:

While there's nothing that prohibits a program from providing clear information rules, there isn't any specific funding stream to tap into for messaging in this regard.

Some instructive lessons have emerged from an Urban Institute study on messaging to immigrants in the Houston area. In Houston, representatives of some organizations said they had engaged their staffs in internal trainings on the public charge rule using national resources such as materials from Protecting Immigrant Families. Additionally, some social service organizations have teamed up with legal service providers to bring attorneys onsite to answer clients' public charge questions. Other social service organizations have leveraged existing resources, such as local legal assistance hotlines, to provide information to immigrant families. Some lessons learned from the study included the need for a rapid response system. Some providers in the study suggested that having a large-scale plan for educating providers about changes, communicating with families about how they could be affected, and advocating for the reversal of harmful policies would help them act quickly on issues that affect immigrant families⁴³.

As for the content behind immigrant-specific information, the state needs to take responsibility at the top of that information tree, meaning the message needs to originate from the governor's office or the governor's cabinet and given special attention to ensure it is reliable.

ISSUE: Across most programs, respondents noted that **lack of trust in government and impacts on immigration was an issue** for New Americans. This issue reflects a distinct lack of trusted messengers to mitigate any lack of trust and communicate needed information.

CONTEXT: According to the Urban Institute, most public agencies and CBOs actively worked to provide accurate information and correct misconceptions but advocates and service providers in each state also noted that some public agency employees promoted these misconceptions to discourage immigrant use of public programs. Additionally, the level of misinformation about programs among low-income noncitizens deters some families from seeking needed benefits; immigrants often rely on social networks and word of mouth to learn about programs. This reliance on informal outreach networks can lead to pervasive misperceptions about how programs work and how to access them⁴⁴.

ACTIONABLE SOLUTION: Counties or agencies looking to dispel misinformation about public benefits should establish partnerships with trusted messengers by consulting the Welcoming America community

⁴³ Gonzalez, Dulce, et al. "Supporting Immigrant Families in Houston: Efforts to Reduce Chilling Effects around the Public Charge Rule at the Local Level." *Urban Institute*, Urban Institute, 16 July 2020, https://www.urban.org/research/publication/supporting-immigrant-families-houston/view/full_report.

⁴⁴ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

engagement tool kit that is specialized for reaching out to refugees⁴⁵. Exact tactics will depend on the goal and capacity of the effort and the amount of resources available but they all revolve around determining what collaboration means and collective goal setting. Community engagement is not undertaken to affirm the status quo, but rather to build the changed conditions necessary to achieve a collective goal that is bold and broad enough to provide mutual benefits for all in the defined communities.

The tool kit describes three platforms of engagement: inform, involve and invest. For counties or agencies just beginning this process within the inform platform, their first step might be connecting with contacts in multiple organizations representing siloed sectors along separate integration pathways to establish two-way channels for periodic communications and outreach that cultivate empathy. Next the effort would consist of building understanding and trust with other communities about their members, about the needs and strengths of the people they assist, about the differences and similarities in their organizational cultures, and about the constraints and flexibilities in their organizational mandates.

Receiving communities develop multiple points of contact to learn from a core group of refugee resettlement agencies about refugees as newcomer groups presenting specific needs, but these receiving community contacts do not assume leadership or decision making about refugees. Arriving and receiving communities begin to identify values and goals that they have in common. There are numerous points of entry for finding this common ground, none more important than another. The entry point could be a need for achieving family stabilization, a mandate to reach underserved communities, a call to welcome the stranger, a curiosity for cross-cultural learning, or an incident of anti-refugee bullying.

Some tactics within the inform platform might include:

- SWOT analysis of internal organizational capacities to achieve characteristics of this platform
- Mapping networks for contacts for outreach and communications
- Contact prioritizing of the strategic importance and pace of outreach to mapped organizations
- Identifying a trusted convener and engaging to assist arriving communities to work together and speak with one voice
- Building trust of collaborators through mutual accountability and facilitated peer networking

⁴⁵ Stein, Paul. "Building and Sustaining Community Collaborations for Refugee Welcome: A Community Engagement Toolkit." *Welcoming America*, Welcoming America,
https://www.welcomingrefugees.org/sites/default/files/documents/resources/Community%20Engagement%20Webinar%20-%20FINAL_501.pptx.

LACK OF OUTREACH AND KNOWLEDGE OF SERVICES

ISSUE: Lack of partnerships with community-based organizations working with New Americans (100%)

CONTEXT: As one New American put it in a focus group, "The language barrier doesn't help already and on top of that they don't help you. Just explain to me how to do it, we don't know how to use a computer, we don't know the language and then get denial letters because we didn't do it right. I hope there is more staff that speak our language and to be more patient, we don't know how to do it and we need their support." However, it must be noted that hiring or contracting with individuals who can speak a language is not the same thing as hiring more interpreters. As one New American put it, "it doesn't bother me to help my people translating but my job is something else...the government needs to pay a fair amount to employees for their language services." According to an Urban Institute report, one health organization in Greene County, North Carolina, improved its rapport with immigrant clients by hiring staff that spoke immigrants' native languages and training them to understand the cultural backgrounds of their clients. As a result, the organization's rapport with the community and the number of clients it serves have grown over the years⁴⁶.

ACTIONABLE SOLUTION: Survey respondents said that a helpful solution for knowledge of services might include **ensuring program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices** and in practical terms, this might mean hosting in-person or virtual equity, diversity and inclusion (EDI) workshops, ensuring that bilingual staff is available or actively recruiting staff that represent New American communities. The state is certainly capable of hiring EDI consultants and facilitating virtual workshops but altering hiring practices may be more difficult.

RURAL/URBAN DIFFERENCES

ISSUE: Lack of transportation options (77%)

CONTEXT: Given the emphasis on in-person preferences and the geographical spread in rural areas, it's not surprising that lack of transportation would be an issue. One proposal that emerged from one of our focus groups

⁴⁶ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

seemed to bridge the transportation divide is by offering mobile offices. One participant said that a helpful solution might be "something like mobile clinics, it worked for the vaccines...in the Mexican Consulate, they have mobile offices where they go to other cities to help with passport applications...". In Massachusetts, CBOs help gather applications and documents in program satellite offices located in hospitals, schools or juvenile courts. In this way, CBOs reinforce the efforts of eligibility workers who can only be in these locations one day a week. According to an Urban Institute study, without dependable public transportation and training in navigating the public transportation system, immigrants were less able to control their day-to-day schedules, keep appointments with caseworkers, and meet work requirements for some public programs⁴⁷. To respond to this type of logistical barrier, some agencies and community organizations that facilitate families' enrollment for Medicaid/CHIP and SNAP provided co-located services in convenient locations, including workplaces with many immigrant employees. Immigrant communities may include playgrounds, libraries, strip malls, public agencies, schools, grocery stores, and workplaces ranging from farms to factories and small businesses. Organizations not associated with social services—such as faith-based organizations, local businesses with extensive and regular contact with community members, and even housing developments with high concentrations of particular immigrant groups—can be effective settings for benefit program application, enrollment, and recertification⁴⁸.

ACTIONABLE SOLUTION: The state should **implement mobile offices or outstationing of eligibility workers in key New American locations** a certain number of days per month to mitigate transportation issues for New Americans in rural areas. Where the state can identify a steady stream of potentially eligible individuals, such as a specific hospital or grocery store favored by New Americans or a Hmong community center, outstationing eligibility workers can be effective. The state can implement a mobile office when New Americans don't occupy a single location in their work lives, as might be the case with migrant workers.

ADDITIONAL CONSIDERATIONS:

For CCAP, there is no requirement to see someone in person.

⁴⁷ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

⁴⁸ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

ISSUE: Across most programs, respondents noted that **technology and internet issues was a major issue** for New Americans in rural areas.

CONTEXT: The Digital Equity Act of 2021 creates an annual 125-million-dollar competitive grant program to support digital inclusion projects undertaken by individual groups, coalitions, and/or communities of interest. The Digital Equity Competitive Grant Program awards grants to eligible entities, including local governments, nonprofits, and community anchor institutions. These funds can be used for a variety of digital inclusion efforts including but not limited to device distribution programs, digital literacy training, and digital navigation assistance.⁴⁹ According to the Pew Center, eight in ten adults who live in rural communities say they use the internet on at least a daily basis. Yet adults who lived in rural areas were more likely to say lack of access to high-speed internet was a major problem in their local community. Similar rates of concern about access to high-speed internet were shared by rural adults in both lower- and higher-income households, as well as by those with various levels of educational attainment.⁵⁰ One promising practice which has emerged in rural localities in Maine and Oklahoma are mobile hotspot lending programs operated out of libraries.⁵¹ One study on the Oklahoma pilot program found the program was highly popular and was reaching the target audience with one of the only complaints being not enough hotspots.⁵²

ACTIONABLE SOLUTION: **The state or county should create a mobile hotspot lending program** by identifying existing CBOs serving rural New Americans and collaborate to provide guidance on how to craft a successful application and submit it to the National Telecommunications and Information Administration (NTIA). If the state can coordinate a joint effort between a network of CBOs and maximize the perceived impact of the grant, the single application may be seen more favorably than submitting multiple individual applications. If the grant is accepted, the coordinating agency can seek references and instructional guides on forms, templates and rental agreements from the Public Library Association's "Hotspot Playbook" web page.⁵³

⁴⁹ Huffman, Amy. "The Infrastructure Act and Digital Equity Act Passed ... Now What?" *National Digital Inclusion Alliance*, 16 Nov. 2021, <https://www.digitalinclusion.org/blog/2021/11/16/the-infrastructure-act-and-digital-equity-act-passed-now-what/>.

⁵⁰ Vogels, Emily A. "Some Digital Divides Persist between Rural, Urban and Suburban America." *Pew Research Center*, Pew Research Center, 19 Oct. 2021, <https://www.pewresearch.org/fact-tank/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>.

⁵¹ Strover Director, Sharon. "Reaching Rural America with Broadband Internet Service." *The Conversation*, 27 Aug. 2019, <https://theconversation.com/reaching-rural-america-with-broadband-internet-service-82488>.

⁵² "Building a Rural Library Hotspot Lending Program: Results from a One-Year Pilot." *The Journal of Extension (JOE)*, <https://archives.joe.org/joe/2019april/a2.php>.

⁵³ Shofmann. "DigitalLead: Rural Libraries Creating New Possibilities." *Public Library Association (PLA)*, 7 May 2021, <https://www.ala.org/pla/initiatives/digitallead/hotspot-playbook>.

Appendix D: Unemployment Insurance (UI)

The top two preferred access modes for New Americans when applying to UI was in-person (45%) and over-the-phone (36%) according to respondents. In-person was the top preference mode for all Coloradans as well (27%) along with online (27%) and over-the-phone (27%).

In a surprising result, none of the respondents indicated that there are any systematic efforts that have been made to specifically conduct outreach for New American clients for Unemployment Insurance. This is the worst outreach outcome across all the programs in the study.

Respondents overwhelmingly state that the proposed solutions have a broader access impact since they see these solutions as transferrable to all Coloradans. However, there is one instance where the transferability is not as likely. Rural solutions to mitigate access to UI for New Americans are the least transferable to all Coloradans. Only 14% of respondents thought these solutions were transferable.

Over 71% of respondents stated that there is a need for briefings on law and regulation updates related to Unemployment Insurance. These briefings seem to be a low-hanging fruit solution that will indirectly support access for New Americans.

All of respondents agreed that there should be targeted efforts to ensure New Americans have equitable access to UI services. This is the largest consensus across all the programs under study.

Below is an inventory of issues as well as solutions identified by the survey. Following the inventory are highlighted issues, actionable solutions, context for those solutions and, when possible, a list of other issues mitigated by the solution.

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
Language Access	
N=6	
1. Lack of available in-person language translation assistance (interpreters) (100%) 2. Lack of available over-the-phone language translation assistance (interpreters) (100%) 3. Lack of available online language translation assistance (interpreters) (83%)	1. Provide multilingual language lines with real people (67%) 2. Provide on-site interpreters (50%) 3. Increase partnerships with community-based organizations or other trusted messengers (50%) 4. Offer multilingual translation options for online materials/applications (17%) 5. Other (please specify) (17%)
Digital Literacy and Digital Access	
N=6	

<ol style="list-style-type: none"> 1. Lack of understanding how to use physical devices, such as phones and computers (100%) 2. Lack of understanding how to use the Internet (100%) 3. No access to a computer, such as a laptop or desktop computer (100%) 4. No access to the Internet (100%) 5. Difficulty navigating new online applications or other processes online (100%) 6. The combination of the needed skills of digital literacy and resources of digital access (100%) 7. Lack of an email account (83%) 8. No access to a mobile device (example: owning an iPhone or iPad or being able to regularly use one) (83%) 	<ol style="list-style-type: none"> 1. Provide clients with other ways to apply, such as in person or over the phone (83%) 2. Ensure that clients can access websites in languages besides English (50%) 3. Provide computer access to clients to apply (33%) 4. Ensure websites are easy to navigate (17%) 5. Offer options to apply on a mobile phone, such as through a mobile-friendly website or with a mobile app (17%)
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Lack of Outreach

N=0

No data available

Administrative Burden & Paperwork

N=1

<ol style="list-style-type: none"> 1. Requiring proof of a high school degree or similar documentation only available in the country of origin (100%) <p>Lack of clear information that an applicant who is not eligible can apply on behalf of others (100%)</p>	<p>There is a need for culturally attuned worker's centers or workforce development centers in each region with enough outreach to the community to build trust. (100%)</p>
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Stigma and Lack of Trust in Government

N=1

<ol style="list-style-type: none"> 1. Lack of trust in government and impacts on immigration (100%) 2. Stigma about receiving benefits (100%) 	<ol style="list-style-type: none"> 1. Use outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights (100%) 2. Removing confidential information from applications whenever possible (100%)
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Rural/Urban Differences

N=7

<ol style="list-style-type: none"> 1. Limited understanding of how to use technology and the Internet (29%) 2. Lack of transportation options (14%) 3. Technology and Internet issues (14%) 4. Access to information (availability, eligibility, reapplication) about Unemployment Insurance benefits (14%) 5. Lack of translation and interpreter resources (14%) 	<ol style="list-style-type: none"> 1. More focus on employers providing correct information and hotlines for people to report intimidation anonymously. (14%)
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LANGUAGE BARRIERS

ISSUE: Lack of available in-person language translation assistance (interpreters) (100%)

CONTEXT: According to one study participant, "not all counties have on-site interpreters that can assist New Americans." According to the survey, 92% of respondents or higher across all programs indicated that lack of in-person language assistance was an issue. Another survey respondent said, "Lack of assistance in your native tongue is a breeding ground for misunderstanding next steps, expectations, etc." Another said, "Since we are a smaller community, the language barrier is more difficult as we do not have staff who can speak other languages and so we have to schedule interpreter, which delays the process."

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **providing (more) on-site interpreters**. Understanding that there are limited resources and the demands across counties may vary, we recommend **prioritizing which specific county offices** receive (more) interpreters. To do this, we would first recommend a supply/demand study to determine the criteria for how to identify and effectively distribute more interpreters. Counties face a supply/demand problem in finding people who can speak the range of languages New Americans speak and getting those individuals to the locations when they are needed.

After the study, the criteria for prioritizing specific county offices could be based on how long wait times are (wait times defined as the amount of time it takes to request an interpreter in person and how long it takes to actually get that interpreter) for on-site interpreters across all offices determined through a survey. Once an average wait time is established, the state could distribute interpreters based on wait times being, for example, 10% over the threshold average. The criteria could also be sourced from an explicit language access policy that sets a threshold at, for example, 3% of limited English proficiency individuals within a given population or the threshold could be a raw number.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

Similar to SNAP and other programs, UI recipients will need assistance for their employment-support and work-search requirement tasks. An alternative would be to contract with community-based organizations to provide "navigator" services in multiple languages for UI applicants and recipients who do not speak English.

ISSUE: New Americans seek out in-person services generally due to the language barriers that exist throughout the system and the understanding that in-person services make them more comfortable communicating and

perhaps receiving more application support.

CONTEXT: As one New American said in a focus group, "the offices are open only 8-5pm but if you have to work then your only option is to do it online and if you can't work the online system then there is the problem." Though survey data shows New Americans and Coloradans both prefer in-person access the most, there's a much larger spread between in-person and the next closest preferred access mode for New Americans compared to Coloradans. The primacy for in-person services among New Americans as well as the apparent lack of digital access and digital literacy necessarily (confirmed by focus group and survey data) means a need for more intentional design in office hours.

If New Americans don't have the skills or the access to use online platforms then intentionally designing office hours is how you meet the New American need for services. New Americans should not be forced to make a choice between work and receiving more personal guidance and language support in applying for benefits. According to the Urban Institute, work obligations also resulted in logistical barriers to applying for and receiving public assistance services with one service provider and community advocate commenting, "When we're open, they're working." To respond to this barrier, some agencies and community organizations provided alternative hours⁵⁴.

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **keeping some offices open past normal business hours**. To prioritize which offices stay open past normal business hours, further study could identify which communities have particularly high populations of New Americans and establish a threshold distance between those communities and the closest office. If no offices exist within the threshold distance, as might be the case with certain rural localities, the state could establish more formal, funded partnerships with more proximate community-based organizations to fill the gap.

If expanded office hours cannot be accommodated, the state should take special notice that explicitly funding partnerships with community-based organizations that work with New Americans is the best way to ensure these services are permanent, sustainable and above all, accessible.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

⁵⁴ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

The automated nature of the intake UI system is an advantage because access is 24/7. However, this means that special focus needs to be paid in the UI program to bridging the digital access divide.

ISSUE: New Americans whose primary language is not English or Spanish are practically out of immediate options to obtain information or application support while using **automated county phone lines**. The issue exists across all programs within the study.

CONTEXT: New Americans in Colorado speak several languages other than English and Spanish. In most cases during the inspection of the automated phone lines, there would be an opportunity to get connected to a third language but if there was a minor issue for the client to make the connection, the client is sent back to the English menu, thus preventing access to non-English or non-Spanish speakers.

ACTIONABLE SOLUTION: Colorado has an opportunity to meet the language needs of New Americans by **providing a full-service language line accessible to all Colorado residents that meet a distinct threshold language** in a county (New Americans and residents with distinct language preferences) across all the study programs by expanding multi-language options of its automated lines (particularly, when automation has become a standard in customer service). This will be a first-of-its-kind and very much welcome service for non-English-speaking residents. While it is important to expand languages on the front-end customer service line, it is equally important that these changes are tested thoroughly so an individual speaking Somalian, for example, can conduct business from beginning to end without having to reconnect to the English menu or lose their place in the queue.

Colorado can double down on facilitating access for New Americans if the language service allows an option for video conference. As reported consistently by New Americans and CBOs, New Americans, in most of their countries of origin, seek and apply for benefits in a one-on-one format, which a virtual conference line could do since they could relate to someone whose looks and experiences are similar. In addition, the virtual service allows for a culturally competent experience where New Americans can (virtually) interact with their interpreter and be fully immersed in accessing benefits/services. If this type of service were made available to New Americans, Colorado will become a leader in multilingual and cultural competency.

DIGITAL LITERACY & DIGITAL ACCESS BARRIERS

Listed below is a discussion of program specific challenges with online applications and online access:

Unemployment Insurance: Our team studied the unemployment application portal ([MyUI](#)) as well as the [website](#) for unemployment in the state of Colorado. We found that the websites themselves were easy to navigate and that documentation could be faxed.

Access barriers included Social Security Number (SSN) and email credential requirements for new claimants (To sign into Connecting Colorado, you need to create a profile and the only way to create a profile is to provide a SSN and an email address, see https://www.connectingcolorado.com/cgi-bin/g_app_new_begin); A user must call a 1-800 number if the user has no email address but the line only offers options in English or Spanish; Driver's license is requested but not required; Chat integration may ease navigation barriers (if any are found by the applicant). Employment history is required for the past 18 months, New Americans may face challenges accessing this program benefits.

Other specific challenges we observed were:

- Unemployment alternative language options are located on the FAQ page but not the FileMy Claim page, a page which is confusing even for digitally literate individuals
- Unable to access bilingual virtual assistant if using the Safari browser but it is accessible if using the Chrome browser
- No alternate language options for eligibility page; however, it does possess a video archive in alternate languages on that page
- Most videos with English and Spanish titles are only spoken and captioned in English; only 2 out of 10 videos are in Spanish
- When applying for benefits, if the user selects Spanish as preferred language on application and opts to receive messages electronically, the user receives a message saying, "All electronic correspondence will be sent in English."

ISSUE: Study participants indicated that **difficulty navigating online applications or other processes online was an issue** for New Americans.

CONTEXT: According to one study participant, the state has "... built our systems without including these groups of people...patch them in with minimal effort." The Urban Institute⁵⁵ found that despite efforts to translate materials across states, English dominates online portals and was typically required to navigate public agency web sites in each state they studied. During our mystery shopper activities, our team identified issues including how the PEAK platform benefits application landing page only has English and Spanish options for users or how the user is required to follow several steps to find over-the-phone help to complete an application. Additionally, the page that appears after clicking the "Help" tab has broken links.

The same study above also found that immigrants from less-developed countries tended to have minimal formal schooling and limited literacy. Applicants must rely on secondhand interpretation of documents, which can prove

⁵⁵ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

difficult if not written (or translated) in plain language or paired with visual alerts or information. It's critical to note that linguistic accessibility approaches for New Americans will vary based on their own educational background. Interviews and survey data suggest differing literacy levels in English as well as in New Americans' own native tongues.

ACTIONABLE SOLUTION: The state should **conduct usability testing with New Americans of multiple linguistic backgrounds** across state benefit application websites, like PEAK, and this effort must also include a plain language review. While the practice of usability testing itself does not typically involve a plain language review, it is clear that complex administrative language is as much a barrier for New Americans as lack of digital literacy in seeking benefits online. For New Americans of higher literacy levels, usability testing and plain language review of physical and digital content will be key, prior to translation. Some administrative jargon does not easily translate to other languages so attempting to conduct a plain language review after translation will likely yield more confusion. During a usability test⁵, you will:

- Learn if participants can complete specified tasks successfully
- Identify how long it takes to complete specified tasks
- Find out how satisfied participants are with your web site or other product
- Identify changes required to improve user performance and satisfaction
- Analyze the performance to see if it meets your usability objectives

Building usability into a web site (or any product) is an iterative process. Consider these elements when budgeting for usability testing:

- **Time:** You will need to allocate time to plan the usability test, allow the usability specialist and the team to become familiar with the site and pilot test scenarios, prepare and run tests, analyze the data, write the report, and present the findings.
- **Recruiting Costs:** Consider how or where you will recruit your participants. You will either need to allow for staff time to recruit or engage a recruiting firm to schedule participants for you based on the requirements.
- **Participant Compensation:** If you will be compensating participants for their time or travel, factor that into your testing budget.

Plain language may include using everyday language and, where possible, images and slow-paced video/audio to assist with meaning; avoiding jargon; and being mindful of nuances of language.

In providing all documents online, state or county offices should be Section 508-compliant by offering Word and HTML options since many PDF files cannot be read by screen reader software packages. All major screen reading packages (VoiceOver, NVDA, JAWS, and TalkBack) have, albeit buggy, translation functionality, but they cannot read the kind of image text that accompanies PDFs.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork #ruralurban differences #digitalliteracy

- The complexity of the application process and instructions is an obstacle for (PROGRAM)
- Lack of transportation options (in rural areas)

ADDITIONAL CONSIDERATIONS:

The UI application platform is state-controlled but when New Americans say they have trouble using applications, most of the programs they're referring to are supported by the PEAK platform.

PEAK is managed by an enterprise level agency created by Colorado several years ago and though it does include programs from multiple state agencies, it effectively means there are multiple groups of different stakeholders who depend on it for eligibility processes. The number of concerned stakeholders as well as the complexity of the system means improving PEAK would require considerable effort. **For the state, changes to the UI platform would involve less stakeholders.**

However, before the initiating agency reaches the level of design changes necessary for improving usability, they must decide whether they should make applications more accessible for New Americans or whether they should make the reading level low enough for the groups that are most vulnerable.

San Diego County opted to pay community organizations to assist people with their online applications platform. If it is too impractical or too long-range to do usability testing, Colorado could also invest in more assistors, contracting specifically to target subpopulations of New Americans.

Though the counties probably have contracts with outreach contractors or immigrant serving organizations already, this new effort would be more targeted about which New Americans are represented and might include developing "mom and pop" CBOs or forming more relationships with independent contractors who are proficient in English, skilled in navigating Colorado systems and can reach out to their own specific communities.

With an online application and a laptop or tablet, contractors or eligibility workers can go anywhere that has a Wi-Fi connection, which may include someone's home, a library or grocery store, so they can assist with a UI application.

The best model for funding is that of community assistors trained in a range of programs, not just PEAK, and trained on how to teach the use of those digital skills.

There are two options available to the state of Colorado: one short term and the other long term. The long-term option is usability testing coupled with expanding language options and adopting plain language. The short-term option is increasing the utilization of community members and CBO's to do application assistance with housing voucher application platforms and the PEAK platform as it already exists.

ISSUE: Limited access to Internet or physical digital access

CONTEXT: Study participants highlighted that even when they are digitally literate, there is limited ability to apply or submit materials due to the lack of available digital access. Study participants were aware of the availability of

libraries and community centers to use computers. However, they pointed out the limited schedule or closed facilities, particularly during the COVID pandemic.

ACTIONABLE SOLUTION: Provide computer access to clients to apply. The recommendation is to increase access to and availability of public computers or kiosks. Due to the regular working hours of the public facilities, individuals who work and have long work commutes are out of options to use public computers. Like suggestions for a more flexible schedule of local agency offices, there is a need for a flexible schedule to access public computers in libraries and community centers. Placing kiosks that allow for applying for a variety of benefits (particularly, those benefits outside of PEAK, like Emergency Rental Assistance Program from the Colorado Department of Local Affairs) will increase access to public programs.

The challenge applies to any locality outside city areas, and it is critical for the rural communities where public digital resources are significantly scarce. The lack of access is particularly limiting for employment-related services where there is a need for continuous use (daily) to comply with work search requirements and to submit resumes. Individuals without access are more likely to not comply with requirements and fail to receive the benefits and services for which they are eligible.

ISSUE: Information and materials are not fully available in multiple languages, the translation is not culturally adequate or there are gaps in the language translation.

CONTEXT: Reliance on Google Translate is partially effective for most languages. Translations of eligibility and how to apply using generic tools may provide potential applicants with a basic understanding of the program requirements, needs and issues.

ACTIONABLE SOLUTION: Ensure materials and technology tools are fully functional and available in multiple languages. It is important to understand that services such as "Google translate" or similar tools do not help with "program lingo". Furthermore, State officials should keep in mind that the literacy level of New Americans may be low to very low. Thus, a one-size-fits-all translation may not be effective in communicating the nuances of what is needed from applicants. Aside from the quality of the translation, there is still the issue of program lingo, the names of forms and eligibility requirements that may not be easily translatable and may require a "cultural" translation. One example of this language gap is in the word "recertification," which may not have a direct translation in many languages.

For effective access by individuals with Limited English Proficiency or those that require a completely immersed alternate language experience, agencies should see to a cultural and full experience language testing of their information and application site. Information and instructions for application should be available in the alternate language from beginning to end.

ADMINISTRATIVE BURDEN & PAPERWORK BARRIERS

ISSUE: At least 70% of the survey respondents agreed that the **complexity of the application process and instructions is an obstacle** for New Americans in accessing the respective programs. There is room for improvement to mitigate the confusion that surrounds the application process by improving how instructions are given to New Americans. Human services agencies have an opportunity to minimize the burden on New Americans to read lengthy documents and help them comply with requirements.

CONTEXT: According to the Center for Budget and Policy Priorities, text messaging is a low-cost and effective means of communicating with clients by sending reminders and other information to a client's mobile phone. Agencies may use a contracted service or capabilities within their own systems to send clients text messages at key points during their application or renewal process which would greatly facilitate instructions. Agencies might send a text message reminding clients that their interview date is approaching, that verification documents are due, or that it is time to complete a renewal request form.

Michigan operated a pilot project testing how text messaging might help clients and caseworkers, with caseworkers sending personalized text messages to clients and clients asking questions and submitting paperwork. For cases involved in the pilot, the average time needed to reach an eligibility determination fell from 13 to 10 days and the approval rate rose from 53 to 67 percent⁵⁶. While small in scope, the pilot offered helpful takeaways for agencies interested in text messaging, including how camera phones make it easier for clients to submit documents, how specific and responsive guidance from caseworkers improves the accuracy of document submission, and faster feedback loops allow errors to be resolved in hours instead of days or weeks. Overall, the **process is simplified and customers get the benefits they need and promptly**. While text messaging may be a helpful approach for reaching some New Americans of higher literacy levels, it's important for agencies to consult with their legal departments to check federal and state regulations on privacy.

⁵⁶ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

As one focus group participant put it, "time and timing the person to read the letter are part of the challenges as well...I have to end up with a pile of letters that no one can read and almost all of the letters have due dates." If instructions and deadlines around the application process are confusing, regular and translated texts (for example, around due dates) could make the application process and application content easier to absorb for New Americans. As one survey respondent said, "Relationships are important...the phone call needs to first be a text message with number they will call from otherwise the New American will not pick up due to the number of solicitations and harassment phone calls they receive." Another respondent said, "Texting is the best with the R&I [Refugee and Immigrant] community." The survey also showed strong support for leveraging text message communication as an accessible and trustworthy approach for reaching New Americans. Focus group participants also reported using mobile phones or having regular access to mobile phones. According to the Center on Budget and Policy Priorities, over 90% of families making less than \$30,000 a year own a mobile phone and smart phone owners use text messaging more than any other feature or app⁵⁷.

Texting seems to be a more accessible and more effective approach to reach New Americans than standard paper mail communications. At a minimum, the ability to quickly inform New Americans of critical deadlines or appointments can reduce the complexity of instructions around these programs and better avoid delays or denials due to missed information.

ACTIONABLE SOLUTION: Texting has the unique ability to provide clearer instructions to New Americans as they go through the complex application process.

On the low end of resource investment, texting can provide digestible, brief content about program eligibility and information and key information on due dates, reminders or deadlines without sifting through lengthy paperwork. The advantage of this level of texting (one-way specific applications, i.e., texts *to* a client, not *from*) may involve sending notices of an appointment, reminders that verification documents are due, information about how to renew expiring benefits, updates on the status of their application and when to expect final notice.

On the high end of investment, two-way texting can provide New Americans a way to ask questions; more easily upload documents and meet verification requirements. Specific two-way applications may include clients sending photos of key required verification documents, like a letter from an employer; clients reporting a change to the agency, such as a new address; clients requesting that the agency reschedule an appointment; caseworkers could quickly notify clients that additional documents are needed to determine eligibility, for example, if the client submitted the wrong pay stubs; or caseworkers could ask questions or request clarification from clients about unclear information. The initiating agency can give clients the opportunity to "opt in" to receiving text messages⁵⁸. The opt-in message should:

⁵⁷ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

⁵⁸ Ibid.

- Identify which agency will send the messages;
- State the general content of the communications (e.g., "Important notifications about your benefits");
- Mention the frequency of the messages;
- Disclose that message and data rates may apply for receiving text messages; and
- Give clients a means to "opt out" of receiving messages in the future.

Advice from those who have used text messaging for human services programs include:

- To avoid suspicion or being viewed as spam, the first text message an agency sends to a client should include the agency's name. It should also explain how the client can opt out of receiving any further messages.
- Make text messages concise. Messages exceeding 140 characters become more than one text.
- Use plain text instead of HTML or rich text so clients without smartphones or those with limited data plans can receive texts.
- Where possible, include a telephone number or website for next steps when action is needed.
- Don't use text messaging to send information that isn't time-sensitive or doesn't require action.
- Be prepared to respond to any reply texts. Or, if no staff are assigned to monitor and respond to text messages, reply texts should generate a standard, automatic response referring the client to a customer service number.
- Evaluate privacy and security considerations if collecting clients' personal information via two-way text messaging.

ADDITIONAL CONSIDERATIONS:

The complexities of these programs make it difficult to create an automated system for verification. Though an automated system can be created to gather up documents necessary for verification, the nuances and questions associated with the documents are not as easily automated. In the short term, it might be more effective to have an assistor work with clients.

Texting has been deployed in the field of health and human services in light of the knowledge of behavioral economics nudges and the understanding that trauma-informed care means giving shorter instructions and pieces of content. It's important to apply these theories around behavioral economics, which may include visual reminders that clearly communicate what you want someone to do as well as the consequence of not doing it; color-coding priorities in materials (red, yellow, green) so, if materials need to mailed, the last item in the series is red. Occasionally, an obstacle to implementing these systems for human services agencies are federal requirements around notifications. When implementing texting systems, human services agencies should remember that, while texting cannot fully replace mailed notifications or what is prescribed in law, it can supplement them.

Especially for New Americans who may have left their country in a rush, each state agency must reflect on what paperwork and documentation is really necessary to collect and, if it is necessary, state agencies should research how they can get that documentation as something other than paper and minimizing associated burdens.

STIGMA AND LACK OF TRUST IN GOVERNMENT

ISSUE: Lack of trust in government and impacts on immigration (100%)

CONTEXT: As one New American said in a focus group, "I never applied for Medicaid because many lawyers' advice was not to apply. There are contradictions, the new Americans are in the middle of the process and how do we know that the state is protecting us? How the state can guarantee that my personal information won't be accessed by immigration?" The chilling effect of public charge policy changes was devastating to New American public trust across the country but given the complexity of immigration laws, a generic approach to disseminating information is not always appropriate. One idea to improve trust of immigrant communities is an information triage system, according to an Urban Institute study that looked at how to improve public trust with immigrant communities in Las Vegas⁵⁹. One model for the kind of content which could be distributed can be found on San Diego County's guidance page on accessing benefits and public charge⁶⁰. This page contains guidance (in English, Spanish, Arabic and Vietnamese) on whether public charge policies apply to an applicant, enrolling children, immigrant rights to healthcare, top 5 facts on public charge and the "ABC's of public charge"; an intuitive guide on who public charge APPLIES to, which BENEFITS are considered, and the totality of CIRCUMSTANCES.

ACTIONABLE SOLUTION: Across most programs, respondents indicated that **outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights** are a top helpful solution in addressing access issues due to stigma and lack of trust of government. To deploy this solution effectively, **the state should create an information triage system based on immigration status**. The state could implement a triage system where standard information goes to less complicated immigration statuses, like green card holders or refugees, and people with more complicated statuses receive more targeted information, like advice to seek an attorney. This information could be delivered by phone (for lower literacy New Americans) and by text (for higher literacy New Americans) in their corresponding languages. The exact content could follow the San Diego model and distribute more general information to all immigrants (examples: "Does public charge apply to me?" and "Top 5 facts on public charge") and more targeted, specific information based on immigration status and household composition (examples: "Enrolling children" and the "ABC's of public charge").

⁵⁹ McTarnaghan, S., Allen, E. H., Caraveo, C. A., & Bernstein, H. (n.d.). *Supporting immigrant families in Las Vegas*. urban.org. Retrieved November 12, 2021, from https://www.urban.org/sites/default/files/publication/102569/supporting-immigrant-families-in-las-vegas_3.pdf.

⁶⁰ San Diego County. (n.d.). *Public charge information*. Public Charge. Retrieved November 12, 2021, from https://www.sandiegocounty.gov/content/sdc/hhsa/programs/ssp/public_charge.html.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork

- The complexity of the application process and instructions is an obstacle for (PROGRAM)

ADDITIONAL CONSIDERATIONS:

While there's nothing that prohibits a program from providing clear information about its rules, there isn't any specific funding stream to tap into for messaging in this regard.

Some instructive lessons have emerged from an Urban Institute study on messaging to immigrants in the Houston area. In Houston, representatives of some organizations said they had engaged their staff in internal trainings on the public charge rule using national resources such as materials from Protecting Immigrant Families. Additionally, some social service organizations teamed up with legal service providers to bring attorneys onsite to answer clients' public charge questions. Other social service organizations leveraged existing resources, such as local legal assistance hotlines, to provide information to immigrant families. A lesson learned from the study the need for a rapid response system. Some providers in the study suggested that having a large-scale plan for educating providers about changes, communicating with families about how they could be affected, and advocating for the reversal of harmful policies would help them act quickly on issues that affect immigrant families⁶¹.

As for the content behind immigrant-specific information, the state needs to take responsibility at the top of that information tree meaning the message needs to originate from the governor's office or the governor's cabinet and special attention must be paid to ensure it is reliable.

ISSUE: Across most programs, respondents noted that **lack of trust in government and impacts on immigration was an issue** for New Americans. This issue reflects a distinct lack of trusted messengers to mitigate any lack of trust and communicate needed information.

CONTEXT: According to the Urban Institute, most public agencies and CBOs actively worked to provide accurate information and correct misconceptions but advocates and service providers in each state also noted that some public agency employees promoted these misconceptions to discourage immigrants' use of public programs. Additionally, the level of misinformation about programs among low-income noncitizens deters some families from seeking needed benefits, and immigrants often rely on social networks and word of mouth to learn about programs. This reliance on informal outreach networks can lead to pervasive misperceptions about how programs work and how to access them⁶².

⁶¹ Gonzalez, Dulce, et al. "Supporting Immigrant Families in Houston: Efforts to Reduce Chilling Effects around the Public Charge Rule at the Local Level." *Urban Institute*, Urban Institute, 16 July 2020, https://www.urban.org/research/publication/supporting-immigrant-families-houston/view/full_report.

⁶² Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

ACTIONABLE SOLUTION: Counties or agencies looking to dispel misinformation about public benefits should establish partnerships with trusted messengers by consulting the Welcoming America community engagement tool kit that is specialized for reaching out to refugees⁶³. Exact tactics will depend on the goal and capacity of the effort and the amount of resources available but they all revolve around determining what collaboration means and collective goal setting. Community engagement is not undertaken to affirm the status quo, but rather to build the changed conditions necessary to achieve a collective goal that is bold and broad enough to provide mutual benefits for all in the defined communities.

The tool kit describes three platforms of engagement: inform, involve and invest. For counties or agencies just beginning this process within the inform platform, their first step might be connecting with contacts in multiple organizations representing siloed sectors along separate integration pathways to establish two-way channels for periodic communications and outreach that cultivate empathy. Next the effort would consist of building understanding and trust with other communities about their members, about the needs and strengths of the people they assist, about the differences and similarities in their organizational cultures, and about the constraints and flexibilities in their organizational mandates.

Receiving communities develop multiple points of contact to learn from a core group of refugee resettlement agencies about refugees as newcomer groups presenting specific needs, but these receiving community contacts do not assume leadership or decision making about refugees. Arriving and receiving communities begin to identify values and goals that they have in common. There are numerous points of entry for finding this common ground, none more important than another. The point could be a need for achieving family stabilization, a mandate to reach underserved communities, a call to welcome the stranger, a curiosity for cross-cultural learning, or an incident of anti-refugee bullying.

Some tactics within the inform platform might include:

- SWOT analysis of internal organizational capacities to achieve characteristics of this platform
 - Mapping networks for contacts for outreach and communications
 - Contact prioritizing of the strategic importance and pace of outreach to mapped organizations
 - Identifying a trusted convener and engaging to assist arriving communities to work together and speak with one voice
 - Building trust of collaborators through mutual accountability and facilitated peer networking
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⁶³ Stein, Paul. "Building and Sustaining Community Collaborations for Refugee Welcome: A Community Engagement Toolkit." *Welcoming America*, Welcoming America,
https://www.welcomingrefugees.org/sites/default/files/documents/resources/Community%20Engagement%20Webinar%20-%20FINAL_501.pptx.

Appendix E: Workforce Centers (WCs)

The top two preferred access modes for New Americans when applying to a WC was in-person (54%) and over-the-phone (21%) according to respondents. Online was the top preference mode for all Coloradans (36%) followed by in-person (29%).

Respondents suggested that the solutions provided for the program barriers are also applicable to all Coloradans. In one of the few programs under study, the solutions to remove rural obstacles to access Workforce Center services are also of benefit to all Coloradans.

Most county agencies and CBOs would like to receive regular briefings on updates to federal and state laws as well as eligibility for safety net access to increase their capacity to serve New Americans in Workforce Centers. Relative to all the programs in this study, 46% of respondents strongly agree on the benefit of regular briefings. This is double or triple the level of interest at the "strongly agree" response shown on other programs.

In the area of perceptions and ideas generation, 85% of the responders supported targeted efforts to ensure New Americans have equitable access to Workforce Center services.

Below is an inventory of issues as well as solutions identified by the survey. Following the inventory are highlighted issues, actionable solutions, context for those solutions and, when possible, a list of other issues mitigated by the solution.

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
Language Access	
N=15	
1. Lack of available in-person language translation assistance (interpreters) (100%) 2. Lack of available over-the-phone language translation assistance (interpreters) (87%) 3. Lack of available online language translation assistance (interpreters) (73%)	1. Increase partnerships with community-based organizations or other trusted messengers (50%) 2. Provide on-site interpreters (50%) 3. Offer multilingual translation options for online materials/applications (38%) 4. Other (please specify) (25%) 5. Provide multilingual language lines with real people (19%) 6. Provide automated multilingual language lines (19%)
Digital Literacy and Digital Access	
N=10	
1. Difficulty navigating new online applications or other processes online (90%)	1. Provide clients with other ways to apply, such as in person or over the phone (60%)

<ol style="list-style-type: none"> 2. Lack of understanding how to use physical devices, such as phones and computers (90%) 3. The combination of the needed skills of digital literacy and resources of digital access (90%) 4. No access to the Internet (90%) 5. No access to a computer, such as a laptop or desktop computer (90%) 6. Lack of understanding how to use the Internet (80%) 7. Lack of an email account (80%) 8. No access to a mobile device (example: owning an iPhone or iPad or being able to regularly use one) (70%) 	<ol style="list-style-type: none"> 2. Ensure that clients can access websites in languages besides English (50%) 3. Ensure websites are easy to navigate (40%) 4. Other (please specify) (40%) 5. Offer options to apply on a mobile phone, such as through a mobile-friendly website or with a mobile app (30%)
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Lack of Outreach

N=2

<ol style="list-style-type: none"> 1. Lack of partnerships with community-based organizations working with New Americans (100%) 2. Lack of data/information about what languages New Americans are speaking (100%) 3. Lack of data/information where communities of New Americans are located (50%) 	<ol style="list-style-type: none"> 1. Ensure program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices (50%) 2. Ensure partnerships with community-based organizations (50%) 3. Create outreach strategies that are designed with and for communities (50%) 4. Ensure materials and technology tools are available in multiple languages (50%)
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Administrative Burden & Paperwork

N=0

No data available

Stigma and Lack of Trust in Government

N=2

<ol style="list-style-type: none"> 1. Lack of trust in government and impacts on immigration (50%) 	<ol style="list-style-type: none"> 1. Collaborate with trusted community leaders and members. (100%) 2. Use outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights. (50%) 3. Collaborate with community-based organizations to perform outreach. (50%)
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Rural/Urban Differences

N=5

<ol style="list-style-type: none"> 1. Technology and Internet issues (100%) 2. Lack of transportation options (100%) 3. Limited understanding of how to use technology and the Internet (100%) 	<p>Increasing digital access, such as improved broadband capacity, as well as more phone and computer access. (40%)</p>
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|---|--|
| <ol style="list-style-type: none"> 4. Lack of translation and interpreter resources (80%) 5. Access to information (availability, eligibility, reapplication) about Workforce Centers benefits (60%) 6. There is more stigma associated with receipt of benefits (40%) 7. The political climate (40%) | |
|---|--|

LANGUAGE BARRIERS

ISSUE: Lack of available in-person language translation assistance (interpreters) (100%)

CONTEXT: According to one study participant, "not all counties have on-site interpreters that can assist New Americans." According to the survey, 92% of respondents or higher across all programs indicated that lack of in-person language assistance was an issue. Another survey respondent said, "Lack of assistance in your native tongue is a breeding ground for misunderstanding next steps, expectations, etc." and another said, "Since we are a smaller community, the language barrier is more difficult as we do not have staff who can speak other languages and so we have to schedule interpreter, which delays the process."

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **providing (more) on-site interpreters**. Understanding that there are limited resources and the demands across counties may vary, we recommend **prioritizing which specific county offices** receive (more) interpreters. To do this, we would first recommend a supply/demand study to determine the criteria for how to identify and effectively distribute more interpreters. Counties face a supply/demand problem in finding people who can speak the range of languages New Americans speak and getting those individuals to the locations when they are needed.

After the study, the criteria for prioritizing specific county offices could be based on the length of wait times (wait times defined as the amount of time it takes from requesting an interpreter in person to how long it takes to actually get that interpreter) for on-site interpreters across all offices as determined through a survey. Once an average wait time is established, the state could distribute interpreters based on wait times being, for example, 10% over the threshold average. The criteria could also be sourced from an explicit language access policy that sets a threshold at, for example, 3% of limited English proficiency individuals within a given population or the threshold could be a raw number.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

Similar to UI program, New Americans in need of Workforce Center services will need assistance for their employment-support and work-search requirement tasks.

ISSUE: **New Americans seek out in-person services** generally due to the language barriers that exist throughout the system and the understanding that in-person services make them more comfortable communicating and perhaps receiving more application support.

CONTEXT: As one New American said in a focus group, "the offices are open only 8-5pm but if you have to work then your only option is to do it online and if you can't work the online system then there is the problem." Though survey data shows New Americans and Coloradans both prefer in-person access the most, there's a much larger spread between in-person and the next closest preferred access mode for New Americans compared to Coloradans. The primacy for in-person services among New Americans as well as the apparent lack of digital access and digital literacy necessarily (confirmed by focus group and survey data) means a need for more intentional design in office hours.

If New Americans don't have the skills or the access to use online platforms, then intentionally designing office hours is how to meet the New Americans' need for services. New Americans should not be forced to make a choice between work and receiving more personal guidance and language support in applying for benefits. According to the Urban Institute, work obligations also resulted in logistical barriers to applying for and receiving public assistance services with one service provider and community advocate commenting, "When we're open, they're working." To respond to this barrier, some agencies and community organizations provided alternative hours⁶⁴.

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **keeping some offices open past normal business hours**. To prioritize which offices stay open past normal business hours, further study could identify which communities have particularly high populations of New Americans and establish a threshold distance between those communities and the closest office. If no offices exist within the threshold distance, as might be the case with certain rural localities, the state could establish more formal, funded partnerships with more proximate community-based organizations to fill the gap.

If expanded office hours cannot be accommodated, the state should take special notice that explicitly funding partnerships with community-based organizations that work with New Americans is the best way to ensure these services are permanent, sustainable and above all, accessible.

⁶⁴ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #ditalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ISSUE: New Americans whose primary language is not English, or Spanish are practically out of immediate options to obtain information or application support while using **automated county phone lines**. The issue exists across all programs within the study.

CONTEXT: New Americans in Colorado speak several languages other than English and Spanish. In most cases during the inspection of the automated phone lines, there would be an opportunity to get connected to a third language but if there was a minor issue for the client to make the connection, the client is sent back to the English menu, thus, preventing access by non-English or non-Spanish speakers.

ACTIONABLE SOLUTION: Colorado has an opportunity to meet the language needs of New Americans by **providing a full-service language line accessible to all Colorado residents that meet a distinct threshold language** in a county (New Americans and residents with distinct language preferences) across all the study programs by expanding multi-language options to its automated lines (particularly, when automation has become a standard in customer service). This will be a first-of-its-kind and very much welcome service for non-English speaking residents. While it is important to expand languages on the front-end customer service line, it is equally important that these changes are tested thoroughly so an individual speaking Somalian, for example, can conduct business from beginning to end without having to reconnect to the English menu or lose their place in the queue.

Colorado can double down on facilitating access for New Americans if the language service allows an option for video conference. As reported consistently by New Americans and CBOs, New Americans, in most of their countries of origin, seek and apply for benefits in a one-on-one format, which a virtual conference line could do since they could relate to someone whose looks and experiences are similar. In addition, the virtual service allows for a culturally competent experience where New Americans can (virtually) interact with their interpreter and be fully immersed in accessing benefits/services. If this type of service were made available to New Americans, Colorado will become a leader in multilingual and cultural competency.

DIGITAL LITERACY & DIGITAL ACCESS

Listed below is a discussion of program specific challenges with online applications and online access:

Colorado Workforce Centers: The program has an online application for the job board with in-person or over-the-phone options for more specific career assistance and has an option for fax transmissions.

Potential barriers include requirement of a Social Security Number (SSN) and email address (To sign into Connecting Colorado, you need to create a profile and the only way to create a profile is to provide a SSN and an email address (https://www.connectingcolorado.com/cgi-bin/g_app_new_begin); in terms of the level and simplicity of instructions available to applicants, it is difficult to navigate; very challenging to navigate without assistance; SSN required for online job website; only other eligibility requirement is for Workforce Innovation and Opportunity Act (WIOA) training.

More specific challenges we observed were:

- Workforce Development page on the CDLE website is not offered in Spanish, only describes the benefits of the program and does not connect with any application or registration platform.
- Actual online job board associated with Workforce Development, called Connecting Colorado, is also not offered in Spanish and user cannot navigate there from the CDLE page.
- Our team tried to call three workforce centers after operating hours and only heard messages in English, no options for alternate languages.
- Eligibility and qualifying information is on the CDLE website but it's located under two sub tabs (first, Job Seeker Training and then the WIOA) and the user must click on the tab to open it.
- Each workforce center may or may not have its own website with important information; some specific workforce center websites offer the option of a Google-translated webpage.

LACK OF OUTREACH AND KNOWLEDGE OF SERVICES

ISSUE: Lack of partnerships with community-based organizations working with New Americans (100%)

CONTEXT: As one New American put it in a focus group, "The language barrier doesn't help already and on top of that they don't help you. Just explain to me how to do it, we don't know how to use a computer, we don't know the language and then get denial letters because we didn't do it right. I hope there is more staff that speak our language and to be more patient, we don't know how to do it and we need their support." However, it must be noted that hiring or contracting with individuals who can speak a language is not the same thing as hiring more interpreters. As another New American put it, "it doesn't bother me to help my people translating but my job is something else...the government needs to pay a fair amount to employees for their language services." According to an Urban Institute report, one health organization in Greene County, North Carolina, improved its rapport with

immigrant clients by hiring staff that spoke immigrants' native languages and training them to understand the cultural backgrounds of their clients. As a result, the organization's rapport with the community and the number of clients it serves have grown over the years⁶⁵.

ACTIONABLE SOLUTION: Survey respondents said that a helpful solution for knowledge of services might include **ensuring program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices** and in practical terms, this might mean hosting in-person or virtual equity, diversity and inclusion (EDI) workshops, ensuring that bilingual staff is available or actively recruiting staff that represent New American communities. The state is certainly capable of hiring EDI consultants and facilitating virtual workshops but altering hiring practices may be more difficult.

RURAL/URBAN DIFFERENCES

ISSUE: Lack of transportation options (100%)

CONTEXT: Given the emphasis on in-person preferences and the geographical spread in rural areas, it's not surprising that lack of transportation would be an issue. One proposal that emerged from one of our focus groups that seems to bridge the transportation divide is offering mobile offices. As one participant described this helpful solution, it might be "something like mobile clinics, it worked for the vaccines...in the Mexican Consulate, they have mobile offices where they go to other cities to help with passport applications...". In Massachusetts, CBOs help gather applications and documents in program satellite offices which can be located in hospitals, schools or juvenile courts. In this way, CBOs reinforce the efforts of eligibility workers who can only be in these locations one day a week. According to an Urban Institute study, without dependable public transportation and training in navigating the public transportation system, immigrants were less able to control their day-to-day schedules, keep appointments with caseworkers, and meet work requirements for some public programs⁶⁶. To respond to this type of logistical barrier, some agencies and community organizations that facilitate families' enrollment for Medicaid/CHIP and SNAP provided co-located services in convenient locations, including workplaces with many immigrant employees. Immigrant communities may include playgrounds, libraries, strip malls, public agencies,

⁶⁵ Hecker, I., & Loprest, P. J. (2019, September 9). *Now hiring: Digital Literacy Skills Required*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/urban-wire/now-hiring-digital-literacy-skills-required>.

⁶⁶ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

schools, grocery stores, and workplaces ranging from farms to factories and small businesses. Organizations not associated with social services—such as faith-based organizations, local businesses with extensive and regular contact with community members, and even housing developments with high concentrations of particular immigrant groups—can be effective settings for benefit program application, enrollment, and recertification⁶⁷.

ACTIONABLE SOLUTION: The state should implement mobile offices or outstationing of eligibility workers in key New American locations a certain number of days per month to mitigate transportation issues for New Americans in rural areas. Where the state can identify a steady stream of potentially eligible individuals, like a specific hospital or grocery store favored by New Americans or a Hmong community center, outstationing eligibility workers can be effective. The state can implement a mobile office when New Americans don't occupy a single location in their work lives, as might be the case with migrant workers.

ISSUE: Across most programs, respondents noted that **technology and internet issues was a major issue** for New Americans in rural areas.

CONTEXT: The Digital Equity Act of 2021 creates an annual \$125 million-dollar competitive grant program to support digital inclusion projects undertaken by individual groups, coalitions, or communities of interest. The Digital Equity Competitive Grant Program awards grants to eligible entities, including local governments, nonprofits, and community anchor institutions. These funds can be used for a variety of digital inclusion efforts, including but not limited to device distribution programs, digital literacy training, and digital navigation assistance.⁶⁸ According to the Pew Center, eight in ten adults who live in rural communities say they use the internet on at least a daily basis. Yet adults who lived in rural areas were more likely to say lack of access to high-speed internet was a major problem in their local community. Similar rates of concern about access to high-speed internet were shared by rural adults in both lower- and higher-income households, as well as by those with various levels of educational attainment.⁶⁹ One promising practice which has emerged in rural localities in Maine and Oklahoma are

⁶⁷ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

⁶⁸ Huffman, Amy. "The Infrastructure Act and Digital Equity Act Passed ... Now What?" *National Digital Inclusion Alliance*, 16 Nov. 2021, <https://www.digitalinclusion.org/blog/2021/11/16/the-infrastructure-act-and-digital-equity-act-passed-now-what/>.

⁶⁹ Vogels, Emily A. "Some Digital Divides Persist between Rural, Urban and Suburban America." *Pew Research Center*, Pew Research Center, 19 Oct. 2021, <https://www.pewresearch.org/fact-tank/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>.

mobile hotspot lending programs operated out of libraries.⁷⁰ One study on the Oklahoma pilot program found the program was highly popular and was reaching the target audience with one of the few complaints being there were not enough hotspots.⁷¹

ACTIONABLE SOLUTION: The state or county should create a mobile hotspot lending program by identifying existing CBOs serving rural New Americans and collaborate to provide guidance on how to craft a successful application and submit it to the National Telecommunications and Information Administration (NTIA). If the state can coordinate a joint effort between a network of CBOs and maximize the perceived impact of the grant, the single application may be seen more favorably than submitting multiple individual applications. If the grant is accepted, the coordinating agency can seek references and instructional guides on forms, templates and rental agreements from the Public Library Association's "Hotspot Playbook" web page.⁷²

⁷⁰ Strover Director, Sharon. "Reaching Rural America with Broadband Internet Service." *The Conversation*, 27 Aug. 2019, <https://theconversation.com/reaching-rural-america-with-broadband-internet-service-82488>.

⁷¹ "Building a Rural Library Hotspot Lending Program: Results from a One-Year Pilot." *The Journal of Extension (JOE)*, <https://archives.joe.org/joe/2019april/a2.php>.

⁷² Shofmann. "DigitalLead: Rural Libraries Creating New Possibilities." *Public Library Association (PLA)*, 7 May 2021, <https://www.ala.org/pla/initiatives/digitallead/hotspot-playbook>.

Appendix F: Emergency Rental Assistance Program (ERAP)

The top two preferred access modes for New Americans when applying to ERAP was in-person (38%) and over-the-phone (28%) according to respondents. Online was the top preference mode for all Coloradans (31%) followed by over-the-phone (24%).

The survey reports that only one in 5 respondents were aware of systematic efforts to specifically conduct outreach for New American clients for ERAP. This is a great opportunity for the state government to bridge the access knowledge with county agencies and CBOs.

In most instances, respondents believe that the proposed solutions would carry over and benefit all Coloradans. This includes solutions to address rural access issues.

Respondents thought that regular briefings on federal and state laws would help the New Americans access ERAP; 93% of respondents agree that there should be targeted outreach to support New Americans access to ERAP.

Below is an inventory of issues as well as solutions identified by the survey. Following the inventory are highlighted issues, actionable solutions, context for those solutions and, when possible, a list of other issues mitigated by the solution.

Issue (Ordered by Respondent Preference)	Solution (Ordered by Respondent Preference)
Language Access	
N=9	
1. Lack of available in-person language translation assistance (interpreters) (100%) 2. Lack of available over-the-phone language translation assistance (interpreters) (100%) 3. Lack of available online language translation assistance (interpreters) (78%)	1. Increase partnerships with community-based organizations or other trusted messengers (67%) 2. Provide multilingual language lines with real people (67%) 3. Provide on-site interpreters (33%) 4. Offer multilingual translation options for online materials/applications (22%) 5. Other (please specify) (11%)
Digital Literacy and Digital Access	
N=8	
1. The combination of the needed skills of digital literacy and resources of digital access (100%) 2. Lack of an email account (100%) 3. Difficulty navigating new online applications or other processes online (100%)	1. Provide clients with other ways to apply, such as in person or over the phone (88%) 2. Offer options to apply on a mobile phone, such as through a mobile-friendly website or with a mobile app (38%)

<p>4. No access to a computer, such as a laptop or desktop computer (100%)</p> <p>5. Lack of understanding how to use physical devices, such as phones and computers (88%)</p> <p>6. Lack of understanding how to use the Internet (88%)</p> <p>7. No access to the Internet (88%)</p> <p>8. No access to a mobile device (example: owning an iPhone or iPad or being able to regularly use one) (88%)</p>	<p>3. Ensure that clients can access websites in languages besides English (38%)</p> <p>4. Other (please specify) (25%)</p> <p>5. Provide computer access to clients to apply (13%)</p>
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Lack of Outreach

N=5

<p>1. Lack of data/information about what languages New Americans are speaking (60%)</p> <p>2. Lack of partnerships with community-based organizations working with New Americans (60%)</p> <p>3. Lack of data/information where communities of New Americans are located (60%)</p>	<p>1. Ensure partnerships with community-based organizations (60%)</p> <p>2. Create outreach strategies that are designed with and for communities (40%)</p> <p>3. Ensure program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices (40%)</p> <p>4. Ensure materials and technology tools are available in multiple languages (20%)</p> <p>5. Conduct outreach through email, texting or digital outreach (20%)</p> <p>6. Conduct outreach through flyers, brochures or hosting tables at events (20%)</p>
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Administrative Burden & Paperwork

N=2

<p>1. Lack of clear information that an applicant who is not eligible can apply on behalf of others (100%)</p> <p>2. Requiring proof of a high school degree or similar documentation only available in the country of origin. (50%)</p>	<p>1. Make the application experience simple and pithy through a cell phone app or easily navigable website (via mobile phone), by reducing the burdens of proof for those without housing contracts or formal pay or the self-employed and by providing funding to CBOs helping applicants navigate this process. (50%)</p>
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Stigma and Lack of Trust in Government

N=5

<p>1. Lack of trust in government and impacts on immigration (100%)</p> <p>2. Stigma about receiving benefits (60%)</p>	<p>1. Collaborate with trusted community leaders and members (60%)</p> <p>2. Collaborate with community-based organizations to perform outreach (40%)</p> <p>3. Removing confidential information from applications whenever possible (40%)</p>
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	<ol style="list-style-type: none"> 4. Use outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights (20%) 5. Collaborate with schools to disseminate information to families (20%) 6. Other (please specify) (20%) 		
Rural/Urban Differences			
N=5	<table border="1"> <tr> <td> <ol style="list-style-type: none"> 1. Lack of translation and interpreter resources (100%) 2. The political climate (100%) 3. Technology and Internet issues (100%) 4. Limited understanding of how to use technology and the Internet (100%) 5. Access to information (availability, eligibility, reapplication) about ERAP benefits (100%) 6. Lack of transportation options (80%) 7. There is more stigma associated with receipt of benefits (40%) </td><td> <ol style="list-style-type: none"> 1. Materials, funding and support for operations that train community navigators in rural areas. (20%) </td></tr> </table>	<ol style="list-style-type: none"> 1. Lack of translation and interpreter resources (100%) 2. The political climate (100%) 3. Technology and Internet issues (100%) 4. Limited understanding of how to use technology and the Internet (100%) 5. Access to information (availability, eligibility, reapplication) about ERAP benefits (100%) 6. Lack of transportation options (80%) 7. There is more stigma associated with receipt of benefits (40%) 	<ol style="list-style-type: none"> 1. Materials, funding and support for operations that train community navigators in rural areas. (20%)
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LANGUAGE BARRIERS

ISSUE: Lack of available in-person language translation assistance (interpreters) (100%)

CONTEXT: According to one study participant, "not all counties have on-site interpreters that can assist New Americans." According to the survey, 92% of respondents or higher across all programs indicated that lack of in-person language assistance was an issue. Another survey respondent said, "Lack of assistance in your native tongue is a breeding ground for misunderstanding next steps, expectations, etc." with another saying, "Since we are a smaller community, the language barrier is more difficult as we do not have staff who can speak other languages and so we have to schedule interpreter, which delays the process."

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **providing (more) on-site interpreters**. Understanding that there are limited resources and the demands across counties may vary, we recommend **prioritizing which specific county offices** receive (more) interpreters. To do this, we would first recommend a supply/demand study to determine the criteria for how to identify and effectively distribute more interpreters and then determine which counties face a supply/demand problem in finding people who can speak the range of languages that New Americans speak and getting those individuals to the locations when they are needed.

After the study, the criteria for prioritizing specific county offices could be based on the length of wait times (wait times defined as the amount of time it takes from requesting an interpreter in person to how long it takes to actually

get that interpreter) for on-site interpreters across all offices as determined through a survey. Once an average wait time is established, the state could distribute interpreters based on wait times being, for example, 10% over the threshold average. The criteria could also be sourced from an explicit language access policy that sets a threshold at, for example, 3% of limited English proficiency individuals within a given population or the threshold could be a raw number.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

Because the ERAP intake process begins with an online screening tool similar to Colorado's Unemployment Insurance (UI) system, to add an in-person interpreter service to this model, community-based organizations would need to be intermediary "navigators" who could provide in-person application assistance in the person's native language.

ISSUE: **New Americans seek out in-person services** generally due to the language barriers that exist throughout the system and the understanding that in-person services make them more comfortable communicating and perhaps receiving more application support.

CONTEXT: As one New American said in a focus group, "the offices are open only 8-5pm but if you have to work then your only option is to do it online and if you can't work the online system then there is the problem." Though survey data shows New Americans and Coloradans both prefer in-person access the most, there's a much larger spread between in-person and the next closest preferred access mode for New Americans compared to Coloradans. The primacy for in-person services among New Americans as well as the apparent lack of digital access and digital literacy necessarily means (confirmed by focus group and survey data) there is a need for more intentional design in office hours.

If New Americans don't have the skills or the access to use online platforms, then intentionally designing office hours is how to meet the New American need for services. New Americans should not be forced to make a choice between work and receiving more personal guidance and language support in applying for benefits. According to the Urban Institute, work obligations also resulted in logistical barriers to applying for and receiving public assistance services with one service provider and community advocate commenting, "When we're open, they're

working." To respond to this barrier, some agencies and community organizations provided alternative hours⁷³.

ACTIONABLE SOLUTION: Immediate and implementable solutions to address this issue may include **keeping some offices open past normal business hours**. To prioritize which offices stay open past normal business hours, further study could identify which communities have particularly high populations of New Americans and establish a threshold distance between those communities and the closest office. If no offices exist within the threshold distance, as might be the case with certain rural localities, the state could establish more formal, funded partnerships with more proximate community-based organizations to fill the gap.

If expanded office hours cannot be accommodated, the state should take special notice that explicitly funding partnerships with community-based organizations that work with New Americans is the best way to ensure these services are permanent, sustainable and above all, accessible.

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #digitalliteracy #digitalaccess

- No access to a computer, such as a laptop or desktop computer
- No access to the Internet
- Difficulty navigating new online applications or other processes online

ADDITIONAL CONSIDERATIONS:

Like the UI system, the ERAP online system has an advantage because of 24/7 access, but not beneficial if a user can't use a computer or doesn't have internet access.

ISSUE: New Americans whose primary language is not English, or Spanish are practically out of immediate options to obtain information or application support while using **automated county phone lines**. The issue exists across all programs within the study.

CONTEXT: New Americans in Colorado speak several languages other than English and Spanish. In most cases during the inspection of the automated phone lines, there would be an opportunity to get connected to a third language but if there was a minor issue for the client to make the connection, the client is sent back to the English menu, thus preventing access by non-English or non-Spanish speakers.

⁷³ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

ACTIONABLE SOLUTION: Colorado has an opportunity to meet the language needs of New Americans by providing a full-service language line accessible to all Colorado residents that meet a distinct threshold language in a county (New Americans and residents with distinct language preferences) across all the study programs by expanding multi-language options to its automated lines (particularly, when automation has become a standard in customer service). This will be a first-of-its-kind and very much welcome service for non-English speaking residents. While it is important to expand languages on the front-end customer service line, it is equally important that these changes are tested thoroughly so an individual speaking Somalian, for example, can conduct business from beginning to end without having to reconnect to the English menu or lose their place in the queue.

Colorado can double down on facilitating access for New Americans if the language service allows an option for video conference. As reported consistently by New Americans and CBOs, New Americans, in most of their countries of origin, seek and apply for benefits in a one-on-one format, which a virtual conference line could do since they could relate to someone whose looks and experiences are similar. In addition, the virtual service allows for a culturally competent experience where New Americans can (virtually) interact with their interpreter and be fully immersed in accessing benefits/services. If this type of service were made available to New Americans, Colorado will become a leader in multilingual and cultural competency.

DIGITAL LITERACY & DIGITAL ACCESS

Listed below is a discussion of program-specific challenges with online applications and online access:

ERAP: Our team found that the ease of navigating to emergency rental assistance online varied based on the user's location. We found that the "Neighborly" platform provided an accessible application experience if the applicant's county used that platform or if user clicked the tab labeled "All Other Cities and Counties" when looking for the region-specific application.

Potential barriers included: Requires an email address; Once the user reaches the "Neighborly" software portal, it's a smooth experience but region-specific links can bring a user either to a consistent "Neighborly" portal or to a series of webpages that look different from one another stylistically and have inconsistent language options (Arapahoe, Weld and Douglas County); English, French and Spanish are only language options in Adams, Jefferson and Aurora County; Website offers a hotline for contact (1-888-480-0066) if the user requires an alternate format but the hotline disconnects (no repeats) if no buttons are pressed after 15 seconds and dialing 1 gets an English prompt, dialing 2 gets a Spanish prompt, dialing 3 for "all other languages" gets the same English prompt.

ISSUE: Information and materials are not fully available in multiple languages, the translation is not culturally adequate or there are gaps in the language translation.

CONTEXT: Reliance on Google Translate is partially effective for most languages. Translations of eligibility and how to apply using generic tools may provide potential applicants with a basic understanding of the program requirements, needs and issues.

With regard to the ERAP system, the Colorado Office of Local Affairs uses a two-tier translation system. First, it uses Google Translate before an application is started. Then, after the individual chooses to apply, the screen goes back to English for the "ERAP Eligibility Tenant Questionnaire". It is important to note that the questionnaire screens do not have the option for an alternate language version. After the applicant somehow follows the five to six screens in English, the website returns to the selected alternate language on the main page. Once the applicant chooses to apply, an application ("Neighborly Software") opens, which includes options for multiple languages. However, the tools still use a rough translation service that mixes words in English with other languages. For example:

"Varias ciudades y condados locales tienen sus propios programas de asistencia para el alquiler. Es posible que reciba servicios más rápido si presenta una solicitud a través de estos otros programas. Se pueden encontrar aquí: <https://cdola.colorado.gov/rental-mortgage-assistance> y haga clic en **Landlords and Tenants** para averiguar cómo presentar la solicitud."

More importantly, the links for references and additional information are in English, particularly for portable document format (PDF) documents.

ACTIONABLE SOLUTION: Ensure materials and technology tools are fully functional and available in multiple languages. It is important to understand that services such as "Google Translate" or similar translation tools do not help with "program lingo". Furthermore, State officials should keep in mind that New Americans may have low to very low literacy levels. Thus, a one-size-fits-all translation may not be effective in communicating the nuances of what is needed from applicants. Aside from the quality of the translation, there is still the issue of program lingo, the naming of forms and eligibility requirements that may not be easily translatable and may require a "cultural" translation. One example of this language gap is the word "recertification," which may not have a direct translation in many languages.

For effective access for individuals with Limited English Proficiency or those that require a complete immersed alternate language experience, agencies should see to a cultural and full experience language testing of their

information and application site. Information and instructions for application should be available in the alternate language from beginning to end.

ADMINISTRATIVE BURDEN & PAPERWORK BARRIERS

ISSUE: At least 70% of the survey respondents agreed that the **complexity of the application process and instructions is an obstacle** for New Americans in accessing the respective programs. There is room for improvement to mitigate the confusion that surrounds the application process by improving how instructions are given to New Americans. There's an opportunity for human services agencies to minimize burden on New Americans to read lengthy documents and be compliant with requirements.

CONTEXT: According to the Center for Budget and Policy Priorities, text messaging is a low-cost and effective means of communicating with clients by sending reminders and other information to a client's mobile phone. Agencies may use a contracted service or capabilities within their own systems to send clients text messages at key points during their application or renewal process which would greatly facilitate instructions. Agencies might send a text message reminding clients that their interview date is approaching, that verification documents are due, or that it is time to complete a renewal.

In Michigan, a pilot project tested how texting might help clients and caseworkers, with caseworkers sending personalized text messages to clients and clients asking questions and submitting paperwork. For cases involved in the pilot, the average time needed to reach an eligibility determination fell from 13 to 10 days and the approval rate rose from 53 to 67 percent⁷⁴. While small in scope, the pilot offered helpful takeaways for agencies interested in text messaging like how camera phones make it easier for clients to submit documents, specific and responsive guidance from caseworkers improves the accuracy of document submission, and faster feedback loops allow errors to be resolved in hours, instead of days or weeks. Overall, the **process is simplified and customers get the benefits they need and promptly**. While texting may be a helpful approach for reaching some New Americans of higher literacy levels, it's important for agencies to consult with their legal departments to check federal and state

⁷⁴ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

regulations on privacy.

As one focus group participant put it, "time and timing the person to read the letter are part of the challenges as well...I have to end up with a pile of letters that no one can read and almost all of the letters have due dates." If instructions and deadlines around the application process are confusing, regular and translated texts (for example, around due dates) could make the application process and application content easier to absorb for New Americans. As one survey respondent said, "Relationships are important...the phone call needs to first be a text message with number they will call from otherwise the New American will not pick up due to the number of solicitations and harassment phone calls they receive." Another respondent said, "Texting is the best with the R&I [Refugee and Immigrant] community." The survey also showed strong support for leveraging text message communication as an accessible and trustworthy approach for reaching New Americans. Focus group participants also admitted using mobile phones or having regular access to mobile phones. According to the Center on Budget and Policy Priorities, over 90% of families making less than \$30,000 a year own a mobile phone and smart phone owners use text messaging more than any other feature or app⁷⁵.

Texting seems to be a more accessible and more effective approach to reach New Americans than standard paper mail communications. At a minimum, the ability to quickly inform New Americans of critical deadlines or appointments can reduce the complexity of instructions around these programs and better avoid delays or denials due to missed information.

ACTIONABLE SOLUTION: Texting has the unique ability to provide clearer instructions to New Americans as they go through the complex application process. On the low end of resource investment, texting can provide digestible, brief content about program eligibility and information and key information on due dates, reminders or deadlines without sifting through lengthy paperwork.

The advantage of this level of texting (one-way specific applications, i.e., texts to a client, not from), may include sending: notices of an appointment, reminders that verification documents are due, information about how to renew expiring benefits, updates on the status of their application and when to expect final notice.

On the high end of investment, two-way texting can provide a way for New Americans to ask questions; more easily upload documents and meet verification requirements. Specific two-way applications may include clients sending photos of key required verification documents, like a letter from an employer; clients reporting a change to the agency, such as a new address; clients could request that the agency reschedule an appointment; caseworkers could quickly notify clients that additional documents are needed to determine eligibility, for example, if the client submitted the wrong pay stubs; or caseworkers could ask questions or request clarification from clients about

⁷⁵ Wagner , J. (2019, May 8). *Leveraging text messaging to improve communications in safety net programs*. Center on Budget and Policy Priorities. Retrieved November 12, 2021, from <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communications-in-safety-net>.

unclear information. The initiating agency can give clients the opportunity to "opt in" to receiving text messages⁷⁶. The opt-in message should:

- Identify which agency will send the messages;
- State the general content of the communications (e.g., "Important notifications about your benefits");
- Mention the frequency of the messages;
- Disclose that message and data rates may apply for receiving text messages; and
- Give clients a means to "opt out" of receiving messages in the future.

Advice from those who have used text messaging for human services programs include:

- To avoid suspicion or being viewed as spam, the first text message an agency sends to a client should include the agency's name. It should also explain how the client can opt out of receiving any further messages.
- Make text messages concise. Messages exceeding 140 characters become more than one text.
- Use plain text instead of HTMO or rich text so clients without smartphones or those with limited data plans can receive texts.
- Where possible, include a telephone number or website for next steps when action is needed.
- Don't use text messaging to send information that isn't time-sensitive or doesn't require action.
- Be prepared to respond to any reply texts. Or, if no staff are assigned to monitor and respond to text messages, reply texts should generate a standard, automatic response referring the client to a customer service number.
- Evaluate privacy and security considerations if collecting clients' personal information via two-way text messaging.

ADDITIONAL CONSIDERATIONS:

The complexities of these programs make it difficult to create an automated system for verification. Though an automated system can be created to gather up documents necessary for verification, the nuances and questions associated with the documents are not as easily automated. In the short term, it might be more effective to have an assistor work with clients.

Texting has been deployed in the field of health and human services in light of the knowledge of behavioral economics nudges and the understanding that trauma-informed care means giving shorter instructions and pieces of content. It's important to apply these theories around behavioral economics, which may include visual reminders that clearly communicate what you want someone to do as well as the consequence of not doing it; color-coding priorities in materials (red, yellow, green) so, if materials need to mailed, the last item in the series is red. Occasionally, an obstacle to implementing these systems for human services agencies are federal requirements around notifications. When implementing texting systems, human services agencies should remember that, while texting cannot fully replace mailed notifications or what is prescribed in law, it can supplement them.

⁷⁶ Ibid.

Especially for New Americans who may have left their country in a rush, each state agency must reflect on what paperwork and documentation is really necessary to collect and if, it is necessary, state agencies should research how they can get that documentation as something other than paper and minimizing associated burdens.

STIGMA AND LACK OF TRUST IN GOVERNMENT

ISSUE: Lack of trust in government and impacts on immigration (100%)

CONTEXT: As one New American said in a focus group, "I never applied for Medicaid because many lawyers' advice was not to apply. There are contradictions, the new Americans are in the middle of the process and how do we know that the state is protecting us? How the state can guarantee that my personal information won't be accessed by immigration?" The chilling effect of public charge was devastating to New American public trust across the country but given the complexity of immigration laws, a generic approach to disseminating information is not always appropriate. One idea to improve trust in immigrant communities is an information triage system, according to an Urban Institute study that looked at how to improve public trust with immigrant communities in Las Vegas⁷⁷. One model for the kind of content which could be distributed can be found on San Diego County's guidance page on accessing benefits and public charge⁷⁸. This page contains guidance (in English, Spanish, Arabic and Vietnamese) on whether public charge applies to an applicant, enrolling children, immigrant rights to healthcare, top 5 facts on public charge and the "ABC's of public charge"; an intuitive guide on who public charge APPLIES to, which BENEFITS are considered, and the totality of CIRCUMSTANCES.

ACTIONABLE SOLUTION: Across most programs, respondents indicated that **outreach materials that explain eligibility requirements, combat misinformation, and explain New Americans' legal rights** as a top helpful solution in addressing access issues due to stigma and lack of trust of government and to deploy this solution effectively, **the state should create an information triage system based on immigration status**. The state could implement a triage system where standard information goes to less complicated immigration statuses, like green card holders or refugees, and people with more complicated statuses receive more targeted information, like advice to seek an attorney. This information could be delivered by phone (for low literacy New Americans) and by text (for

⁷⁷ McTarnaghan, S., Allen, E. H., Caraveo, C. A., & Bernstein, H. (n.d.). *Supporting immigrant families in Las Vegas*. urban.org. Retrieved November 12, 2021, from https://www.urban.org/sites/default/files/publication/102569/supporting-immigrant-families-in-las-vegas_3.pdf.

⁷⁸ San Diego County. (n.d.). *Public charge information*. Public Charge. Retrieved November 12, 2021, from https://www.sandiegocounty.gov/content/sdc/hhsa/programs/ssp/public_charge.html.

higher literacy New Americans) in their corresponding languages. The exact content could follow the San Diego model and distribute more general information to all immigrants (examples: the "Does public charge apply to me?" and "Top 5 facts on public charge") and more targeted, specific information based on immigration status and household composition (examples: "Enrolling children" and the "ABC's of public charge").

RELATED ISSUES ALSO MITIGATED BY SOLUTION: #administrativeburden&paperwork

- The complexity of the application process and instructions is an obstacle for (PROGRAM)

ADDITIONAL CONSIDERATIONS:

While there's nothing that prohibits a program from providing clear information about its rules, there isn't any specific funding stream to tap into for messaging in this regard.

Some instructive lessons have emerged from an Urban Institute study on messaging to immigrants in the Houston area. In Houston, representatives of some organizations said they had engaged their staff in internal trainings on the public charge rule using national resources such as materials from Protecting Immigrant Families. Additionally, some social service organizations have teamed up with legal service providers to bring attorneys onsite to answer clients' public charge questions. Other social service organizations have leveraged existing resources, such as local legal assistance hotlines, to provide information to immigrant families. Some lessons learned from the study included the need for a rapid response system. Some providers in the study suggested that having a large-scale plan for educating providers about changes, communicating with families about how they could be affected, and advocating for the reversal of harmful policies would help them act quickly on issues that affect immigrant families⁷⁹.

As for the content behind immigrant-specific information, the state needs to take responsibility at the top of that information tree, meaning the message needs to originate from the governor's office or the governor's cabinet and given special attention to ensure it is reliable.

ISSUE: Across most programs, respondents noted that **lack of trust in government and impacts on immigration was an issue** for New Americans. This issue reflects a distinct lack of trusted messengers to mitigate any lack of trust and communicate needed information.

CONTEXT: According to the Urban Institute, most public agencies and CBOs actively worked to provide accurate information and correct misconceptions but advocates and service providers in each state also noted that some public agency employees promoted these misconceptions to discourage immigrant use of public programs. Additionally, the level of misinformation about programs among low-income noncitizens deters some families from seeking needed benefits; immigrants often rely on social networks and word of mouth to learn about programs. This reliance on informal outreach networks can lead to pervasive misperceptions about how programs work and how to

⁷⁹ Gonzalez, Dulce, et al. "Supporting Immigrant Families in Houston: Efforts to Reduce Chilling Effects around the Public Charge Rule at the Local Level." *Urban Institute*, Urban Institute, 16 July 2020, https://www.urban.org/research/publication/supporting-immigrant-families-houston/view/full_report.

access them⁸⁰.

ACTIONABLE SOLUTION: Counties or agencies looking to dispel misinformation about public benefits should establish partnerships with trusted messengers by consulting the Welcoming America community engagement tool kit that is specialized for reaching out to refugees⁸¹. Exact tactics will depend on the goal and capacity of the effort and the amount of resources available, but they all revolve around determining what collaboration means and collective goal setting. Community engagement is not undertaken to affirm the status quo, but rather to build the changed conditions necessary to achieve a collective goal that is bold and broad enough to provide mutual benefits for all in the defined communities.

The tool kit describes three platforms of engagement: inform, involve and invest. For counties or agencies just beginning this process within the inform platform, their first step might be connecting with contacts in multiple organizations representing siloed sectors along separate integration pathways to establish two-way channels for periodic communications and outreach that cultivate empathy. Next the effort would consist of building understanding and trust with other communities about their members, about the needs and strengths of the people they assist, about the differences and similarities in their organizational cultures, and about the constraints and flexibilities in their organizational mandates.

Receiving communities develop multiple points of contact to learn from a core group of refugee resettlement agencies about refugees as newcomer groups presenting specific needs, but these receiving community contacts do not assume leadership or decision making about refugees. Arriving and receiving communities begin to identify values and goals that they have in common. There are numerous points of entry for finding this common ground, none more important than another. The entry point could be a need for achieving family stabilization, a mandate to reach underserved communities, a call to welcome the stranger, a curiosity for cross-cultural learning, or an incident of anti-refugee bullying.

⁸⁰ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

⁸¹ Stein, Paul. "Building and Sustaining Community Collaborations for Refugee Welcome: A Community Engagement Toolkit." *Welcoming America*, Welcoming America, https://www.welcomingrefugees.org/sites/default/files/documents/resources/Community%20Engagement%20Webinar%20-%20FINAL_501.pptx.

Some tactics within the inform platform might include:

- SWOT analysis of internal organizational capacities to achieve characteristics of this platform
- Mapping networks for contacts for outreach and communications
- Contact prioritizing of the strategic importance and pace of outreach to mapped organizations
- Identifying a trusted convener and engaging to assist arriving communities to work together and speak with one voice
- Building trust of collaborators through mutual accountability and facilitated peer networking

LACK OF OUTREACH AND KNOWLEDGE OF SERVICES

ISSUE: Lack of partnerships with community-based organizations working with New Americans (60%)

CONTEXT: As one New American put it in a focus group, "The language barrier doesn't help already and on top of that they don't help you. Just explain to me how to do it, we don't know how to use a computer, we don't know the language and then get denial letters because we didn't do it right. I hope there is more staff that speak our language and to be more patient, we don't know how to do it and we need their support." However, it must be noted that hiring or contracting with individuals who can speak a language is not the same thing as hiring more interpreters. As one New American put it, "it doesn't bother me to help my people translating but my job is something else...the government needs to pay a fair amount to employees for their language services." According to an Urban Institute report, one health organization in Greene County, North Carolina, improved its rapport with immigrant clients by hiring staff that spoke immigrants' native languages and training them to understand the cultural backgrounds of their clients. As a result, the organization's rapport with the community and the number of clients it serves have grown over the years⁸²

ACTIONABLE SOLUTION: Survey respondents said that a helpful solution for knowledge of services might include **ensuring program staff and/or volunteers represent the populations served and are trained in equity and inclusion practices** and in practical terms, this might mean hosting in-person or virtual equity, diversity and inclusion (EDI) workshops, ensuring that bilingual staff is available or actively recruiting staff that represent New American communities. The state is certainly capable of hiring EDI consultants and facilitating virtual workshops but altering hiring practices may be more difficult.

⁸² Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services*. Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

RURAL/URBAN DIFFERENCES

ISSUE: Lack of transportation options (80%)

CONTEXT: Given the emphasis on in-person preferences and the geographical spread in rural areas, it's not surprising that lack of transportation would be an issue. One proposal that emerged from one of our focus groups that seemed to bridge the transportation divide is offering mobile offices. One participant describing this helpful solution said it might be "something like mobile clinics, it worked for the vaccines...in the Mexican Consulate, they have mobile offices where they go to other cities to help with passport applications..." . In Massachusetts, CBOs help gather applications and documents in program satellite offices located in hospitals, schools or juvenile courts. In this way, CBOs reinforce the efforts of eligibility workers who can only be in these locations one day a week. According to an Urban Institute study, without dependable public transportation and training in navigating the public transportation system, immigrants were less able to control their day-to-day schedules, keep appointments with caseworkers, and meet work requirements for some public programs⁸³. To respond to this type of logistical barrier, some agencies and community organizations that facilitate families' enrollment for Medicaid/CHIP and SNAP provided co-located services in convenient locations, including workplaces with many immigrant employees. Locations in Immigrant communities may include playgrounds, libraries, strip malls, public agencies, schools, grocery stores, and workplaces ranging from farms to factories and small businesses. Organizations not associated with social services—such as faith-based organizations, local businesses with extensive and regular contact with community members, and even housing developments with high concentrations of particular immigrant groups—can be effective settings for benefit program application, enrollment, and recertification⁸⁴.

ACTIONABLE SOLUTION: The state should implement mobile offices or outstationing of eligibility workers in key New American locations a certain number of days per month to mitigate transportation issues for New Americans in rural areas. Where the state can identify a steady stream of potentially eligible individuals, like a specific hospital or grocery store that's favored by New Americans or a Hmong community center, outstationing

⁸³ Perreira, K. M., Crosnoe, R., Fortuny, K., Pedroza, J., Ulvestad, K., Weiland, C., Yoshikawa, H., & Chaudry, A. (2012, May). *Barriers to immigrants access to health and human services ...* Urban.org. Retrieved November 12, 2021, from <http://webarchive.urban.org/UploadedPDF/413260-Barriers-to-Immigrants-Access-to-Health-and-Human-Services-Programs.pdf>.

⁸⁴ Chaudry, A., Fortuny, K., & Pedroza, J. (2020, May 4). *Improving access of low-income immigrant families to health and human services.* Urban Institute. Retrieved November 12, 2021, from <https://www.urban.org/research/publication/improving-access-low-income-immigrant-families-health-and-human-services>.

eligibility workers can be effective. The state can implement a mobile office when New Americans don't occupy a single location in their work lives, as might be the case with migrant workers.

ISSUE: Across most programs, respondents noted that **technology and internet issues was a major issue** for New Americans in rural areas.

CONTEXT: The Digital Equity Act of 2021 creates an annual 125-million-dollar competitive grant program to support digital inclusion projects undertaken by individual groups, coalitions, and/or communities of interest. The Digital Equity Competitive Grant Program awards grants to eligible entities, including local governments, nonprofits, and community anchor institutions. These funds can be used for a variety of digital inclusion efforts, including but not limited to device distribution programs, digital literacy training, and digital navigation assistance.⁸⁵ According to the Pew Center, eight in ten adults who live in rural communities say they use the internet on at least a daily basis. Yet adults who lived in rural areas were more likely to say lack of access to high-speed internet was a major problem in their local community. Similar rates of concern about access to high-speed internet were shared by rural adults in both lower- and higher-income households, as well as by those with various levels of educational attainment.⁸⁶ One promising practice which has emerged in rural localities in Maine and Oklahoma are mobile hotspot lending programs operated out of libraries.⁸⁷ One study on the Oklahoma pilot program found the program was highly popular and was reaching the target audience with one of the few complaints being there were not enough hotspots.⁸⁸

ACTIONABLE SOLUTION: The state or county should create a mobile hotspot lending program by identifying existing CBOs serving rural New Americans and collaborate to provide guidance on how to craft a successful application and submit it to the National Telecommunications and Information Administration (NTIA). If the state can coordinate a joint effort between a network of CBOs and maximize the perceived impact of the grant, the single application may be seen more favorably than submitting multiple individual applications. If the grant is accepted,

⁸⁵ Huffman, Amy. "The Infrastructure Act and Digital Equity Act Passed ... Now What?" *National Digital Inclusion Alliance*, 16 Nov. 2021, <https://www.digitalinclusion.org/blog/2021/11/16/the-infrastructure-act-and-digital-equity-act-passed-now-what/>.

⁸⁶ Vogels, Emily A. "Some Digital Divides Persist between Rural, Urban and Suburban America." *Pew Research Center*, Pew Research Center, 19 Oct. 2021, <https://www.pewresearch.org/fact-tank/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>.

⁸⁷ Strover Director, Sharon. "Reaching Rural America with Broadband Internet Service." *The Conversation*, 27 Aug. 2019, <https://theconversation.com/reaching-rural-america-with-broadband-internet-service-82488>.

⁸⁸ "Building a Rural Library Hotspot Lending Program: Results from a One-Year Pilot." *The Journal of Extension (JOE)*, <https://archives.joe.org/joe/2019april/a2.php>.

the coordinating agency can seek references and instructional guides on forms, templates and rental agreements from the Public Library Association's "Hotspot Playbook" web site.⁸⁹

Appendix G: Housing Choice Voucher (HCV)

While findings were extremely limited for HCV due to small sample size, the survey shows that the top barriers chosen were language barriers and administrative barriers.

⁸⁹ Shofmann. "DigitalLead: Rural Libraries Creating New Possibilities." *Public Library Association (PLA)*, 7 May 2021, <https://www.ala.org/pla/initiatives/digitallead/hotspot-playbook>.

