

Marylou Sudders, Secretary  
Executive Office of Health and Human Services

Amy Kershaw, Commissioner  
Department of Transitional Assistance

May 10, 2021

Dear Secretary Sudders and Commissioner Kershaw,

As statewide and community-based anti-poverty organizations serving low-income households across the Commonwealth, we commend DTA for its efforts to both expand access and reduce barriers to SNAP during the unprecedented crisis of the COVID pandemic. Since March of 2020, the state's SNAP caseload has grown by 26% – an unprecedented increase in SNAP participation. This increase, coupled with the SNAP benefit boosts authorized by Congress, has nearly doubled the federal SNAP dollars for Massachusetts households from \$100 million per month pre-pandemic to nearly \$200 million per month. We appreciate that DTA has robustly pursued federal waivers and options to quickly process applications and connect low-income eligible households to SNAP.

Thanks to the American Rescue Plan (ARP) passed in March 2021, **Massachusetts will receive nearly \$29 million in additional SNAP administrative funds** over the next three years, with the largest portion of administrative funding available to states in federal fiscal years 2022 and 2023.<sup>1</sup> This federal funding presents significant opportunities for Massachusetts to support the growing SNAP caseload and reduce the number of eligible families who lose SNAP due to paperwork barriers, more rapidly close the current "SNAP Gap," and improve access for the years ahead. Focusing the ARP funds on increasing DTA caseworker capacity and implementing IT/systems improvements is critical to expanding food access for households that have been disproportionately harmed by COVID. These investments are particularly important to reach Black and Latino families who have faced significantly higher rates of food insecurity in Massachusetts both before and since COVID.<sup>2</sup>

We write to ask the Administration to use the ARP administrative SNAP funding to implement the following:

- **Increase the number of DTA SNAP caseworkers to maintain customer service and ensure that diversity, equity, and inclusion considerations are prioritized in hiring.** Increased staffing is especially important to close the "SNAP gap" as USDA is likely to sunset COVID-related administrative flexibilities in 2022 (such as the waiver of the interview for most applicants). DTA needs to ensure cases continue to be quickly processed, and households are not subject to the long wait-times or dropped calls prevalent for much of 2020.

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<sup>1</sup> [USDA Memo](#): Disbursement of SNAP State Administrative Expense Funding Provided by the American Rescue Plan Act of 2021. April 29, 2021.

<sup>2</sup> Weekly food insecurity data as of March 2021 based on US Census Pulse Survey found that that 1 in 4 Black and Hispanic/Latino Massachusetts families with children face food insecurity – compared to 1 in 7 white families. State data from [Northwestern University Institute for Policy Research](#). See also the Greater Boston Food Bank, [Gaps in Food Access during the COVID Pandemic in Massachusetts](#), May 2021, and the Mass [DPH COVID-19 Community Impacts Survey Preliminary Analysis](#) as of April 28, 2021 confirming significantly higher rates of food insecurity among immigrant communities and communities of color.

- **Ensure local DTA offices are accessible and safe for DTA staff and low-income households who need in-person access.** Access to local offices is essential for households that are experiencing homelessness, phoneless, or have challenges navigating DTA’s phone system, internet or smartphone-based customer service tools.
- **Invest in strategies to address the anticipated loss of the SNAP “Emergency Allotments” before these emergency benefits sunset, potentially at the end of 2021.** This includes developing targeted text messages, notices, brochures and other materials to guide SNAP households in claiming deductions that can boost their regular benefits. Increased staffing at the Senior Assistance Office would also allow DTA to proactively contact elder and disabled SNAP households that have not claimed medical expenses.
- **Invest in strategies to reach eligible immigrant-headed households.** DTA could develop consumer-friendly materials to actively myth-bust immigrant fears exacerbated by the former public charge rules, and affirmatively reach out to immigrant families who disenrolled over the past 4 years. Funding could also be used to support community-based organizations able to provide targeted outreach to immigrant communities.
- **Improve access for Limited English Proficient households.** DTA’s notices, text messages, and forms are currently only in English and Spanish. DTA should take steps to expand translation of critical notices and forms into additional languages, prioritizing the SNAP Interim Report and Recertification forms, the Verification Checklist, text messages, and any notices that require affirmative client action to get or keep benefits.
- **Invest in systems improvements that decrease procedural closings and “churn.”** For example, SNAP households comfortable with technology should be allowed to complete their Interim Report and Recertification forms via the DTA Connect mobile app. DTA could also create an option to allow households to exchange text messages with case workers in certain situations, such as when mandatory proofs are missing or the SNAP case is within 10 days of SNAP closing or being reduced.

We are confident that with targeted investments Massachusetts will continue to ensure that low-income residents have access to critical federal food benefits. MLRI and members of the Massachusetts SNAP Coalition would appreciate an opportunity to meet with EOHHS and DTA to learn what the Administration is planning to prioritize with the American Rescue Plan funds.

Sincerely,

AARP Massachusetts  
 About Fresh  
 Action for Boston Community Development  
 Inc.  
 Allston Brighton Health Collaborative  
 Amherst Survival Center  
 Ascentria Community Services  
 Backyard Growers  
 Boston Area Rape Crisis Center  
 Boston Public Health Commission  
 Building Audacity  
 Cambridge Economic Opportunity Committee

Casa Myrna Vazquez  
 Catholic Charities of Worcester County  
 Central West Justice Center  
 Children's HealthWatch  
 CLASP Community Partnership Group -  
 Diane Sullivan  
 Coalition for Social Justice  
 Commonwealth Care Alliance  
 Community Action Agency of Somerville, Inc.  
 Community Servings  
 DotHouse Health  
 Economic Mobility Pathways (EMPath)

Fourth Presbyterian Church Food Pantry,  
South Boston  
Franklin Food Pantry  
Greater Boston Legal Services  
Growing Places  
Health Care For All  
Health Law Advocates  
Health Leads  
Jewish Family & Children's Service  
Literacy Volunteers of Greater Worcester  
Loaves and Fishes Food Pantry  
Martha's Vineyard Center for Living  
Massachusetts Coalition for the Homeless  
Massachusetts Council on Aging  
Massachusetts Food System Collaborative  
Massachusetts Immigrant and Refugee  
Advocacy Coalition  
Massachusetts Law Reform Institute  
Massachusetts Public Health Association  
Merrimack Valley Food Bank, Inc.  
Metropolitan Area Planning Council  
National Association of Social Workers - MA  
Chapter  
New American Association of Massachusetts  
Northeast Justice Center

Office of Food Access City of Boston  
Prescott Mill Apartments  
Project Bread  
Quinsigamond Community College  
Regional Environmental Council  
Revere on the Move  
Rosie's Place  
Servants of Hope Food Pantry  
Sociedad Latina  
St. Francis House  
Temple Sinai of Sharon  
The Family Pantry of Cape Cod  
The Food Bank of Western Massachusetts  
The Food Project, Inc.  
The Greater Boston Food Bank  
The Open Door  
The Worcester Area Mission Society  
Tufts Health Plan Foundation  
UMass Memorial Health Care  
Veterans Legal Services  
Vital CXNs  
Worcester Community Action Council  
Worcester County Food Bank, Inc.  
World Leadership & Inspirational Foundation  
Inc.