



Kurt Messner, Acting Director
Bonnie Braithwaite, SNAP Director
Food and Nutrition Service, USDA
10 Causeway Street
Boston, MA 02222

March 10, 2015

Mary Lou Sudders, Secretary
Executive Office of Health and Human Services
One Ashburton Place
Boston, MA 02108

Dear Administrator Messner, SNAP Director Braithwaite, Secretary Sudders:

I am the Senior Youth Programs Manager at the Mayor's Summer Youth Employment Program (MSYEP) in Cambridge, MA, where I have worked for 14 years. MSYEP is a job placement program for youth aged 14-18 who live in Cambridge. Our goal is to expose high school students in the community to the professional world and potential educational or career paths. The majority of youth participating in MSYEP are from low-income families. Approximately 65 percent of our participants receive free or reduced school lunch, and we believe the majority of our youth participants are from households that receive federal SNAP benefits (food stamps).

I am writing to bring to your attention significant problems that our low income families are facing with respect to their SNAP benefits. We are constantly seeing large scale threats of termination of SNAP due to the Massachusetts DTA demanding verification of the youth's income. MSYEP places Cambridge youth in paid work internships in the summer, fall and spring. Virtually all of these youth participants *are full or part-time students* in the Cambridge public and charter school systems. Our largest program by far is our summer program, which places about 950 youth with employers for 6 to 7 weeks during the summer. The spring program, for example, is smaller and places 55 high school students in 12-week internships. We work with over 1,000 youth annually. Over the past 2 or 3 years I have run programming for about 2,500 to 2,800 youth ages 14-18. All of our youth participants attend skill-building workshops and are placed at sites that enrich their education and encourage them to pursue their goals in the future, and we try to support them in obtaining those goals.

It is our understanding that federal law states that earnings of a child under the age of 18 and in school (full or part time) are not countable for SNAP. We have always operated on that belief and have assured our families that they need not worry about their child's earnings, including during summer vacations until their child turns 18, or drops out of school. Before March of 2014, my office would occasionally hear from the parents of the youth in our programs who sought verification of their children's internship payments for DTA purposes. In early 2014, requests for DTA verification of the youth internships spiked dramatically. I have had to field hundreds of calls about this problem and have heard countless times that families are unable to get through to DTA and cannot get anyone to help them at DTA with this problem. I have also heard from families whose SNAP benefits were delayed or closed because DTA wanted more documentation about the earnings of their teenager.

To date, I have received about 180 requests from parents for verification of their children's employment income since March, 2014. Because some of my families have multiple children in the same

household, I have had to gather information about employment income for more than 200 children. Just between November 2014 and February 2015, I was contacted by 45 families representing 50 youth. I hear about issues involving SNAP and a wage match almost every day. Some recent examples include:

- For one family, I had to write *four different letters for four different children in the same family*—all of whom had worked through our program.
- In another case, a Cambridge family called me because the letter they had previously submitted from me included information for two siblings in the program. DTA again wanted a separate letter for each child.
- A parent I spoke with was very worried his daughter's earnings would affect his family's benefits. His daughter actually asked her internship placement to decrease her hourly wages from \$10 to \$8 per hour because of her parents' concern. The hosting organization would not agree because of the wage rules they had set up for the youth summer students. *The youth was so worried about the impact of her work on her family's SNAP that she asked to volunteer without pay instead!*

I now get calls about wage matches for children who worked at the MSYEP almost every day. Since October 2014, I have noticed a serious uptick in families calling me because their SNAP case was closed or benefits delayed. I appreciate that DTA underwent a modernization change to how they do business with clients. However, I am very worried that what appears to be unfiltered wage matching is exacerbating this problem and making it impossible for families to get this problem resolved without an advocate. DTA knows the age of these children and could just ask the family if the child is in school. DTA should know these children are in school or have a way to find out—without putting such a burden on families.

I also note that the DTA wage match notices state that the employer is the “City of Cambridge.” This DTA notice is confusing for many families who do not realize that the notice is referring to the child's employment through MSYEP. Parents have told me they think they should discourage their children from working because of their mistaken belief that the notice means that their child's internship payments will reduce or close their SNAP benefits. I know the SNAP rules state that the income of a minor in school does not count, but the notices sent by DTA do not say that and low income families do not know. I cannot understand why DTA continues to request these families provide verification of earnings that do not even count. I even have families coming back to me repeat times when they get more DTA wage match notices—after they have already fixed the problem in the past!

The drastic increase in income verification requests has placed an enormous administrative burden on me and on my office. We do not have the capacity to respond quickly and accurately to so many requests for letters verifying that youth have been “terminated” from “employment.” It has been draining to deal with panicked families facing a delay or stop to their SNAP benefits and I cannot always get families the documents they need in time. More critically, I am extremely worried about the families who do not get to me and who go hungry or allow their SNAP case to close out of fear. I also worry that this bad policy at DTA is having a hugely negative impact on the youth who participate in our program. Their summer internships should not have any impact on the ability of their families to put food on the table!

Please let us know what we can do to fix this problem.

Sincerely,



George Hinds
Senior Youth Programs Manager
City of Cambridge Office of Workforce Development

Cc. Representative Marjorie Decker,