

December 12, 2014

Congressman Michael E Capuano
110 First Street
Cambridge, MA 02141

Kurt Messner, Acting Director
Food and Nutrition Service
U.S. Department of Agriculture
10 Causeway Street
Boston, MA 02222

The Honorable Martin Walsh
Boston City Hall
City Hall Square
Boston, MA 02201

Dear Congressman Capuano, Mayor Walsh, Director Messner:

I am writing to ask your help for our most vulnerable low income students are facing trying to hang onto their food stamps/SNAP nutrition benefits One of our roles at Bunker Hill Community College is to assist low income students with applying for SNAP benefits. We also run a food pantry and mobile market at Bunker Hill Community College, but as today's Globe story highlights for students around the state, food pantries are running short to meet the increased demand. (Boston Globe, 12/15/14 *"Their budgets strained, students turn to campus food pantries."*)

In the past few months, we have heard from Bunker Hill Community College students who have been sent notices from the Department of Transitional Assistance (DTA) threatening them with closure of their SNAP cases if they do not produce 4 pay stubs or a letter from the Commonwealth of Massachusetts that verifies the amount of their **Federal Work Study income**. Federal Work Study is non-countable income for SNAP and does and has no impact on SNAP benefits. In fact, receipt of Federal Work Study is one of the ways full-time college students qualify for SNAP under federal law.

When we help the students file SNAP applications, our Single Stop office also provides DTA with proof of the student's financial aid including Federal Work Study they receive. We use DTA forms, signed by college officials, which confirm the students' enrollment, tuition and fees, amount of financial aid they are receiving and as whether they are participants in the Federal Work Study Program.

In the past few months, we have been contacted by several students who have lost SNAP benefits or threatened with termination. DTA has sent these students Department of Revenue wage match notices seeking 4 pay stubs or a statement from their employer. The DTA letter refers to their employer as the "Commonwealth of Massachusetts, Ashburton Place, 12th floor, Boston, MA. Please note, this is the location in Massachusetts where all Federal Work

Study payments are processed for every student in the Commonwealth. Some students who have received this notice think that DTA is accusing them of working at Ashburton Place and accusing them of not disclosing this information, therefore cutting off their SNAP. Other students have tried to write to this address asking them for a statement, to no avail.

Last Friday, we contacted Patricia Baker at the Mass Law Reform Institute after hearing from four more students in the past 10 days who received these DTA notices demanding more proof of Work Study beyond the documents we already sent in. MLRI suggested we contact the Department of Transitional Assistance (DTA) directly to ask why additional wage verification was needed since the state SNAP regulations clearly say that verification of non-countable income, such as work study, is not required unless questionable.¹ DTA informed us in an email that the only way the student's SNAP cases can be opened is if the students provide copies of their Work Study pay checks, even though work study is not-countable income. DTA's demand for unnecessary documentation is not required under the SNAP regulations and has caused interruptions and improper denials for students.

Below are descriptions of three students who have contacted Single Stop USA with these troubling DTA notices.

At the very end of August, Latissa contacted Single Stop USDA. She sent us the following email, describing what happened: "I got a letter saying that I was working over the summer at "1 Ashburton Place in Boston" starting on June 6th and made over \$700. This wasn't true. My last pay from my work study job ended June 4th or 5th as I had finished work around May 15th. What was annoying was this DTA letter came at the very end of August. DTA did not give me much time to get my documents together to prove I wasn't working. I managed to get my documents together by the end of August. When I received my Food Stamps on the 5th of September I figured everything was fine and the info I sent was enough to keep my case going since my DTA counselor didn't contact me to tell me otherwise. Then at the end of September I got another DTA letter saying the information I faxed still wasn't enough, and that my case would close on October 5th unless I had the proper documents. Again they waited too late to let me know. So I sent my documents in on again. I went two full weeks without my Food Stamps. If it wasn't for Single Stop advocating for me, I'm not sure I would have been able to get my food stamps back."

Another student, Nesrine, sent us an email with a copy of the DTA form and wrote on the form back to DTA that she was "not working at: 1 Ashburton Place." Again, Ashburton Place is where the pay checks originate. We had already reported to DTA that Nesrine was eligible for and receiving Work Study, but DTA still sent her this notice.

¹ MLRI cited the following state regulations, 106 CMR 361.610(A), (non-countable income need not be verified, unless it is determined to be questionable). 106 CMR 361.620 identifies the criteria for when information is considered questionable for SNAP purposes.

A third student, Kristin, is a young woman who received multiple DOR wage match letters from DTA for work study income, even though her Work Study income had already been reported. We asked the Mass Law Reform Institute to help with this SNAP case and we learned that, in fact, DTA had been erroneously counting her Work Study as income in her SNAP calculation. DTA also sent her repeated requests for Work Study documents despite having already shown DTA this information. Krisen lost some of her SNAP benefits for close to six months.

We are bringing this information to your attention because we are frustrated that our students and students throughout the Commonwealth – who are struggling to overcome poverty and other obstacles while they seek to complete their college education – are faced with form letters stating wrong information which is resulting in their SNAP benefits ending. The he students should not have to deal with this unnecessary and harmful paper chase.

Thank you for any help you can give us.

Kathleen B. O'Neill

A handwritten signature in cursive script that reads "Kathleen B. O'Neill".

Director, Single Stop
Bunker Hill Community College
617-228-3330

cc. Massachusetts Law Reform Institute