

March 18, 2015

The Honorable Charlie Baker Governor of Massachusetts Massachusetts State House Office of the Governor Room 208 Boston, MA 02133

Dear Governor Baker,

On behalf of The Greater Boston Food Bank (GBFB), we are writing to request your help in protecting the Commonwealth's most vulnerable citizens and to bring your attention to the challenges they are facing to secure and maintain their food stamps/SNAP nutrition benefits. The Supplemental Nutrition Assistance Program (SNAP) is a vital nutritional resource for our clients. SNAP benefits, paired with the food they receive from GBFB's 548 member agencies throughout eastern Massachusetts, are critical components to those in need having enough nutritious food to eat. We are deeply concerned with the changes the Department of Transitional Assistance (DTA) implemented in 2014 that have resulted in erroneous case closures and erroneous application denials of critical federal nutrition benefits.

The Greater Boston Food Bank is committed to serving the most vulnerable populations, including children and seniors. The current issues surrounding SNAP benefits and the DTA are severely affecting these individuals and their families. Each day, many are forced to make difficult choices between buying enough nutritious food to stay healthy and paying for critical bills such as medical, housing and utility expenses. GBFB currently assists seniors to apply for these benefits through our SNAP Outreach program, and we have seen a significant amount of their cases closed for erroneous reasons.

Seniors in particular are vulnerable because they live on fixed incomes while costs of living increase. They cannot keep up. For many, purchasing food becomes the last priority. By not having enough to eat and sacrificing nutrition, their health is further jeopardized, which perpetuates the financial challenges they already face. The negative health benefits that seniors face can take a toll, but we also know that this situation is remediable through participation in effective programs such as SNAP. In many ways, SNAP serves as a safety net for many seniors by ensuring that they are protected from the harmful effects of food insecurity.

We are alarmed to learn from USDA data that the SNAP caseload has declined by more than 7.7 percent since December 2013 while the Massachusetts unemployment rate has declined by only 1 percent. And, there is no evidence that low income households are bouncing back as rapidly. As of February 2015, we believe



Massachusetts is turning away over \$12 million in federal SNAP benefits every month, and failing to provide thousands of families with SNAP who rely on this vital source of food to keep their children healthy.

GBFB's member agencies have seen just over a 5% increase in clients seeking their services since October 2014. They attribute this increase to many having their SNAP benefits cut off without notice. We have seen and heard thousands of stories from clients who have lost their benefits. They have no other option than to turn to our member agencies for increased food assistance.

The majority of our concerns can be broken down into three areas; issues regarding applications and submitted documents getting lost in the system and subsequently not attended to; submitted recertifications that are not processed resulting in cases being closed automatically; and erroneous, unfiltered wage matches also resulting in automated case closings.

Case denied due to getting lost in the system

We have seen multiple issues related to applications and documents not being processed due to the new modernization model at DTA. We have two specific examples including a 78 year old man and a disabled woman who recently lost her job due to being diagnosed with cancer. In the case of the 78 year old man, he submitted his application and all necessary documents in the beginning of December. He completed his phone interview and was told he was all set, yet never heard anything further from DTA. He recently contacted our SNAP Outreach Coordinator inquiring about his application. We learned his application was never "wrapped up" by the case worker and due to the new system structure; it was never looked at again until our Outreach Coordinator inquired. The client reported he had frequently tried to follow up via the DTA hotline and was unable to get through. Had he not been connected to an advocate, he would have missed out on the \$194 per month he desperately needs. The case of the disabled woman battling cancer was similar. She submitted all necessary paperwork and completed the required phone interview. In her situation, the case worker wrapped up the case and submitted it to the supervisor queue to be signed off on. The case stayed in the queue for 21 days and never got signed, ultimately exceeding the 30 day application time period resulting in an automatic denial. The client was hospitalized several times during this period, but still attempted to contact someone via the hotline and was unable to connect with anyone. These two cases were resolved because the clients had access to an advocate. We are sincerely concerned for the thousands of clients who do not have advocates or other forms of support, and are solely relying on the efficiency of the new business practice redesign.

Recertifications not processed causing case closures

We recently assisted an 80 year old woman whose benefits were shut off in January. The client was unaware that her case had been closed until she went to the grocery store to use her card and was told there was no money on it. This was an upsetting and mortifying experience for this client. This client connected with our SNAP Outreach Coordinator in February and explained the situation. After investigating, we learned that her case was listed as closed due to lack of recertification and that she had to reapply for because her case had been closed for more than 30 days. A new application was



submitted for the client with all the required documents. The client contacted the Outreach Coordinator three weeks after submitting the new application because she had not received any form of correspondence from DTA. Our SNAP Outreach Coordinator contacted a Regional Director to remedy the situation. At this time, it was confirmed that the client had indeed submitted her recertification in December, but it was never processed. In turn, she should never have been made to reapply and her case should have never been closed. This client almost lost out on \$776 in benefits due to the

disorganization and inefficiency of this new system. We are greatly concerned and have received a significant amount of calls from seniors with similar experiences.

Unfiltered wage match results in case closure

We are extremely concerned by the number of case closures that have been reported due to erroneous wage match letters being sent to clients, subsequently resulting in automated closures. GBFB was contacted by a client who received a wage match letter for a \$.10 payment. The client had a small part in a movie 30 years ago and periodically receives small payments when that movie is shown. The wage match letter was triggered when the client received a \$.10 payment from 20th Century Fox. The letter stated the client needed to prove he wasn't their employee by providing a letter from the organization. Our SNAP Outreach Coordinator contacted DTA and explained the situation highlighting how difficult it would be for the client to obtain a letter from 20th Century Fox. The case worker stated a self-declaration explaining the situation would be sufficient. A self-declaration letter was submitted by the client prior to the deadline, but because it was never processed the case ultimately closed.

We are providing you with this case example because it highlights some of the largest issues associated with DTA's data matching procedures; primarily that they are unfiltered and lack parameters to prevent clients who receive non-countable income from being subjected to automated case closings. This example also highlights that regardless that the client took all of the appropriate steps; their case was still closed due to a flawed system structure.

We are seeing an uptick in requests for emergency food from our food pantries, which increase pressure on the entire emergency food assistance system. Those losing SNAP benefits are financially eligible, but DTA has created a system that is too difficult to navigate and requires excessive information verification demands that has no bearing on current eligibility.

The decision to rush into a major modernization redesign in 2014 coupled with what appears to be extreme demands for verifications of out-of-date information and automated case closures due to unfiltered data matching, is extremely troubling. Requiring families to provide documentation for jobs worked in the past is not



only excessive and unnecessary, but impact health and cause confusion among a population that is already weary of taking advantage of these programs due to fear and pride.

We urge the Baker Administration to investigate the thousands of SNAP case closures in Massachusetts, to end automatic closures of cases due to data matching, and to look to other means tested programs for guidance on successfully enrolling and retaining eligible participants. We bring this information to your attention because we are concerned about the lasting impact it will have on the health of our very vulnerable senior citizens.

Sincerely,

Catherine D'Amato President and CEO

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CC:

Governor Charlie Baker

Mayor Martin Walsh

Senator Elizabeth Warren

Senator Edward Markey

Thomas J. Vilsack Secretary of Agriculture United States Department of Agriculture

Kurt Messner, Acting Administrator Food and Nutrition Service