April 9, 2015

Thomas G. Massimo Office of the Commissioner 600 Washington Street Boston, MA 02111

Dear Commissioner Massimo,

As advocates for the elderly, we are writing to raise our concerns over the noticeable drop in Massachusetts SNAP enrollment in recent months, and the resulting loss in nutrition funding for elderly households, and for the state's grocery retailers.

The individual SNAP participation rate in Massachusetts has declined at 8 times the national average. The household SNAP participation rate is declining at 7 times the national average. Between December 2013 and December 2014, the number of SNAP recipients in Massachusetts fell by 8.8% --a drop of 77,140 individuals. Massachusetts is losing an estimated \$200 million per year in direct and spin-off economic activity due to this drop in SNAP enrollment.

The agencies we represent have worked hard over the years to find households eligible for SNAP benefits, and to help them enroll in this program. We have benefit enrollment projects that actually help seniors complete and file their SNAP applications, so we are concerned by any downturn in enrollment.

One of the contributing factors in this downturn has been the "business modernization" changes made in DTA's processing rules, including erroneous data matching; increased verification demands, and automatic case closings. Is has been reported that when DTA changed its data matching process last spring, thousands of erroneous SNAP denials/closings occurred. DTA's computer system was automatically closing cases without SNAP worker review to determine if requested documents were sent in or even needed. In addition, documents are being put in the case record but not processed in a timely way, resulting in denials and case closures. Clients have been asked to send in documents multiple times. Documents submitted to DTA's Document Management Center are not being acted on or reviewed by SNAP workers. SNAP applications and renewal forms filed are frequently not being processed. Applications are being denied for "lack of verifications."

The DTA Assistance phone line appears to be unable to handle the level of call volume being received, and many phone calls are dropped or callers give up. Clients are not receiving pre-scheduled DTA phone calls for the required application interview. It is challenging for clients to get through the DTA Assistance Line to schedule an interview or ask questions. The DTA Assistance line automatically hangs up when too many people are calling in.

Local DTA offices are no longer accepting hand delivered documents. Elders who attempt to hand deliver documents are routinely told they must "mail documents to Taunton" or they can "wait 2-3 hours" to hand a document to a DTA worker. Walk-in clients are often not screened for expedited

(emergency) SNAP benefits upon first contact, instead of being given paper applications to mail on their own. Walk-ins are also sometimes told to leave and call DTA Assistance Line for help with their case.

The thousands of case closures in the Massachusetts SNAP program, and the process issues cited above, suggest that the SNAP enrollment and reenrollment process needs to be repaired, and efforts made to ensure that every senior who needs this vital program is able to easily get onto the program, and stay enrolled as long as they are eligible.

Please let us know what DTA's plan is to improve these application and processing problems, and inform us how community-based agencies like ours can help DTA turn around the drop in SNAP enrollment in the Commonwealth.

Yours,

Al Norman Mass Home Care

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David Stevens
Mass Councils on Aging