



Northampton  
**Survival  
Center**

A food pantry serving the  
Hampshire County community

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[www.northampton-survival.org](http://www.northampton-survival.org)

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December 23, 2014

Marylou Sudders  
Secretary Designate  
Executive Office of Health and Human Services  
Boston, MA

Dear Secretary Designate Sudders:

We are a group of Western MA organizations that work on the front lines of food security issues and have come together because of recent concerns about issues in the SNAP program. We are reaching out to you at the outset of your administration to ask you to bring your expertise and concern for solid management and demonstrable results to an important and widespread problem affecting the vulnerable food-insecure population in Massachusetts.

In the year between September 2013 and September 2014 there was an alarming 7.3% drop in the food stamp caseload in Massachusetts. As of May 2014, this decline far surpassed the national decline that only averaged a 1.79% decline. In real numbers, this meant a drop of nearly 65,000 participants in the SNAP program across Massachusetts. Unfortunately this caseload decline does not signal increased food security; on the contrary, we are seeing a significant uptake in the use of food pantries and food banks.

While we cannot definitively determine the cause of this decrease, we note many problems related to the implementation of some modernization programs that almost certainly have a role. The Department of Transitional Assistance (DTA) implemented an "Electronic Document Management Center" (EDMC) system in February 2014 that created a centralized repository in Taunton for receipt of all documents submitted related to a recipient's SNAP case file. Thus recipients across the state must submit verifications and other paperwork to Taunton, where the documents are supposed to be uploaded to the recipient's file. While initially the system appeared to work well, a surge in unfiltered, error-prone data matching in the spring and the concomitant exponential increase in required verifications, resulted in a significant backlog of documents to be entered and erroneous case closings. As of December 22<sup>nd</sup>, we learned that the DTA Dashboard, which tracks unprocessed documents in the EDMC, showed close to 74,000 documents in the Taunton Electronic Document Management Center (EDMC) that were 6 days old or older, and another 12,500 documents that were between 2-5 days old and unprocessed.



Hand-in-hand with the EDMC, DTA has also implemented a new centralized phone system for many SNAP recipients. Where recipients previously had an assigned caseworker at the nearest DTA office, the new system eliminates the individual case worker model and substitutes a centralized 800 number where recipients talk to a random worker in a random office somewhere in the state who answers that particular call. As we are seeing it, there are several problems with this system.

1. Difficult to speak to a live person: To access a live worker, a caller is instructed by the phone system to first key in their year of birth, the zip code DTA has on record, then their EBT card number, and then their Social Security number. If they cannot provide all of these, they are told to hang up and call back when they have the information. There is no opportunity to press "0" to talk with a live person. The prompts are very confusing for someone who has applied for SNAP benefits and is calling to check on their application; without an EBT card number it's impossible for them to get in to the system and talk to a worker at all.

2. Cannot leave a message: The DTA phone system doesn't allow for leaving messages. Apparently DTA contracted for only 200 incoming phone lines in the system, which we understand does not supply the actual number of lines needed. As a result, the system instructs the caller to hang up and call back later and/or simply hangs up on the caller. It is particularly onerous to require families with limited minutes on "free phones" to have to call back repeatedly.

3. Case records are lacking: Once a recipient gets through, the DTA worker is supposed to be able to log on to the case file and see all of the documents and narrative in the file. This step is dependent upon prior caseworkers dutifully recording the narrative from prior conversations with the recipient as well as the smooth functioning of the EDMC, but we are hearing of too many instances where there is no or limited narrative in the case records. SNAP applicants and recipients as well as community organizations report documents aren't being pulled into the case record timely or at all, the EDMC fax line for faxing in documents is frequently busy, and clients are having to submit documents repeatedly. Community organizations also report that DTA worker handling of cases is erratic with different outcomes depending on the DTA worker, which suggests a lack of sufficient worker training.

4. Problems with changes in local office protocol: In light of DTA modernization, local offices have not provided sufficient staff to assist walk-in clients who are unable to use the DTA Assistance line (because of lack of a phone, lack of sufficient minutes, or difficulty communicating by phone or understanding complex prompts). Individuals who bring required documents in to the local offices to submit are often sent away with an envelope to mail those documents in to the Taunton EDMC office unless they wait up to 2-3 hours to see a worker. Surely it makes more sense to allow a client to walk in to their local office, get a date stamped copy of their documents, and then leave them for the local office to mail to Taunton.

Apparently the modernization plans implemented by DTA were not beta tested nor sufficiently piloted around the state, as recommended by the Public Consulting Group (and done in other states with successful modernization models). Proper testing, sufficient resources and training for the DTA field staff, and sufficient resources to implement modernization smoothly seem to be the critical prelude to SNAP's effectiveness and reach.

The DTA business modernization practices undertaken in 2014 are part of a cluster of administrative and policy changes that have contributed to the dramatic SNAP caseload decrease. We would welcome the opportunity to discuss these and other DTA practices that have been implemented hastily and, based on our assessment, have caused thousands of low-income residents of the Commonwealth to lose access to their lifeline benefits. We know you are as interested as we are in insuring the SNAP program works well and that eligible individuals and families are able to participate in the program. We have no doubt DTA wants the program to run effectively as well, but to date it has not been able to remedy the limiting aspects of modernization and the troubling decrease in case loads.

As the new state government takes shape, this is the perfect time to be working together on the front end of the new administration to discuss steps that could be taken to improve the modernization systems and thereby insure access to SNAP benefits for the many eligible recipients in Massachusetts. To this end, we were hoping to meet with you either during the week of January 12, 2015 or January 19, 2015. We will be glad to come to Boston.

Thank you for your consideration, for your concern for well-run governmental programs, and for getting back to us with a meeting date and time that works to your convenience. I will be out of the office until January 5<sup>th</sup>, but please feel free to contact Elizabeth Silver at 413 570-0087, or at [atty.esilver@gmail.com](mailto:atty.esilver@gmail.com), to discuss the further and to schedule a convenient time to meet.

Sincerely,



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Northampton Survival Center

On behalf of:  
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Executive Director, Community Action

Mindy Domb  
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