

Marylou Sudders, Secretary
Executive Office of Health and Human Services

Amy Kershaw, Commissioner
Department of Transitional Assistance

May 10, 2021

Dear Secretary Sudders and Commissioner Kershaw,

As statewide and community-based anti-poverty organizations serving low-income households across the Commonwealth, we commend DTA for its efforts to both expand access and reduce barriers to SNAP during the unprecedented crisis of the COVID pandemic. Since March of 2020, the state's SNAP caseload has grown by 26% – an unprecedented increase in SNAP participation. This increase, coupled with the SNAP benefit boosts authorized by Congress, has nearly doubled the federal SNAP dollars for Massachusetts households from \$100 million per month pre-pandemic to nearly \$200 million per month. We appreciate that DTA has robustly pursued federal waivers and options to quickly process applications and connect low-income eligible households to SNAP.

Thanks to the American Rescue Plan (ARP) passed in March 2021, **Massachusetts will receive nearly \$29 million in additional SNAP administrative funds** over the next three years, with the largest portion of administrative funding available to states in federal fiscal years 2022 and 2023.¹ This federal funding presents significant opportunities for Massachusetts to support the growing SNAP caseload and reduce the number of eligible families who lose SNAP due to paperwork barriers, more rapidly close the current “SNAP Gap,” and improve access for the years ahead. Focusing the ARP funds on increasing DTA caseworker capacity and implementing IT/systems improvements is critical to expanding food access for households that have been disproportionately harmed by COVID. These investments are particularly important to reach Black and Latino families who have faced significantly higher rates of food insecurity in Massachusetts both before and since COVID.²

We write to ask the Administration to use the ARP administrative SNAP funding to implement the following:

- **Increase the number of DTA SNAP caseworkers to maintain customer service and ensure that diversity, equity, and inclusion considerations are prioritized in hiring.** Increased staffing is especially important to close the “SNAP gap” as USDA is likely to sunset COVID-related administrative flexibilities in 2022 (such as the waiver of the interview for most applicants). DTA needs to ensure cases continue to be quickly processed, and households are not subject to the long wait-times or dropped calls prevalent for much of 2020.

¹ [USDA Memo](#): Disbursement of SNAP State Administrative Expense Funding Provided by the American Rescue Plan Act of 2021. April 29, 2021.

² Weekly food insecurity data as of March 2021 based on US Census Pulse Survey found that that 1 in 4 Black and Hispanic/Latino Massachusetts families with children face food insecurity – compared to 1 in 7 white families. State data from [Northwestern University Institute for Policy Research](#). See also the Greater Boston Food Bank, [Gaps in Food Access during the COVID Pandemic in Massachusetts](#), May 2021, and the Mass [DPH COVID-19 Community Impacts Survey Preliminary Analysis](#) as of April 28, 2021 confirming significantly higher rates of food insecurity among immigrant communities and communities of color.

- **Ensure local DTA offices are accessible and safe for DTA staff and low-income households who need in-person access.** Access to local offices is essential for households that are experiencing homelessness, phoneless, or have challenges navigating DTA’s phone system, internet or smartphone-based customer service tools.
- **Invest in strategies to address the anticipated loss of the SNAP “Emergency Allotments” before these emergency benefits sunset, potentially at the end of 2021.** This includes developing targeted text messages, notices, brochures and other materials to guide SNAP households in claiming deductions that can boost their regular benefits. Increased staffing at the Senior Assistance Office would also allow DTA to proactively contact elder and disabled SNAP households that have not claimed medical expenses.
- **Invest in strategies to reach eligible immigrant-headed households.** DTA could develop consumer-friendly materials to actively myth-bust immigrant fears exacerbated by the former public charge rules, and affirmatively reach out to immigrant families who disenrolled over the past 4 years. Funding could also be used to support community-based organizations able to provide targeted outreach to immigrant communities.
- **Improve access for Limited English Proficient households.** DTA’s notices, text messages, and forms are currently only in English and Spanish. DTA should take steps to expand translation of critical notices and forms into additional languages, prioritizing the SNAP Interim Report and Recertification forms, the Verification Checklist, text messages, and any notices that require affirmative client action to get or keep benefits.
- **Invest in systems improvements that decrease procedural closings and “churn.”** For example, SNAP households comfortable with technology should be allowed to complete their Interim Report and Recertification forms via the DTA Connect mobile app. DTA could also create an option to allow households to exchange text messages with case workers in certain situations, such as when mandatory proofs are missing or the SNAP case is within 10 days of SNAP closing or being reduced.

We are confident that with targeted investments Massachusetts will continue to ensure that low-income residents have access to critical federal food benefits. MLRI and members of the Massachusetts SNAP Coalition would appreciate an opportunity to meet with EOHHS and DTA to learn what the Administration is planning to prioritize with the American Rescue Plan funds.

Sincerely,

AARP Massachusetts
 About Fresh
 Action for Boston Community Development
 Inc.
 Allston Brighton Health Collaborative
 Amherst Survival Center
 Ascentria Community Services
 Backyard Growers
 Boston Area Rape Crisis Center
 Boston Public Health Commission
 Building Audacity
 Cambridge Economic Opportunity Committee

Casa Myrna Vazquez
 Catholic Charities of Worcester County
 Central West Justice Center
 Children's HealthWatch
 CLASP Community Partnership Group -
 Diane Sullivan
 Coalition for Social Justice
 Commonwealth Care Alliance
 Community Action Agency of Somerville, Inc.
 Community Servings
 DotHouse Health
 Economic Mobility Pathways (EMPath)

Fourth Presbyterian Church Food Pantry,
South Boston
Franklin Food Pantry
Greater Boston Legal Services
Growing Places
Health Care For All
Health Law Advocates
Health Leads
Jewish Family & Children's Service
Literacy Volunteers of Greater Worcester
Loaves and Fishes Food Pantry
Martha's Vineyard Center for Living
Massachusetts Coalition for the Homeless
Massachusetts Council on Aging
Massachusetts Food System Collaborative
Massachusetts Immigrant and Refugee
Advocacy Coalition
Massachusetts Law Reform Institute
Massachusetts Public Health Association
Merrimack Valley Food Bank, Inc.
Metropolitan Area Planning Council
National Association of Social Workers - MA
Chapter
New American Association of Massachusetts
Northeast Justice Center

Office of Food Access City of Boston
Prescott Mill Apartments
Project Bread
Quinsigamond Community College
Regional Environmental Council
Revere on the Move
Rosie's Place
Servants of Hope Food Pantry
Sociedad Latina
St. Francis House
Temple Sinai of Sharon
The Family Pantry of Cape Cod
The Food Bank of Western Massachusetts
The Food Project, Inc.
The Greater Boston Food Bank
The Open Door
The Worcester Area Mission Society
Tufts Health Plan Foundation
UMass Memorial Health Care
Veterans Legal Services
Vital CXNs
Worcester Community Action Council
Worcester County Food Bank, Inc.
World Leadership & Inspirational Foundation
Inc.