



John Polanowicz, Secretary
 Executive Office of Health and Human Services
 One Ashurton Street, Boston MA 02108

October 17, 2014

Stacey Monahan, Commissioner
 Department of Transitional Assistance
 600 Washington Street, Boston, MA 02111

Dear Secretary Polanowicz and Commissioner Monahan:

The undersigned groups work with very low income households who rely on SNAP benefits to meet their basic food needs.

We are writing to you because of our concern with SNAP job search requirements. The Massachusetts SNAP E&T State Plan estimates that nearly 90,000 households this year will have to prove job search as a condition of eligibility. If individuals do not comply or cannot comply, they are disqualified from benefits. If the head of household has three or more disqualifications, the entire household – including children – loses benefits. We have heard that hundreds of individuals each month are being disqualified for noncompliance. We understand that this policy is not required because federal SNAP rules allow the state to make job search and other employment activities voluntary.

Based on our experience working with needy households, we know that making someone do job search almost never gets the person a job. We also know that many people are not able to comply with the requirements for documenting job search. It does not make sense to us that these individuals – often those with the greatest barriers to employment – would be denied food because of failure to comply with a requirement the state does not have to impose.

Here are examples of real people whose benefits were terminated because DTA has chosen to make job search mandatory.

- Jane S (not her real name) was told she had to make 18 job contacts but the DTA form only has room for 10 contacts. Ms. S attached a second page with the additional contacts but the DTA worker issued the disqualification anyhow on the ground that the second page (in the same handwriting) could have been filled out by her mother. An advocate intervened, and got Ms. S's benefits restored.
- Steve R (not his real name) lives in a sober house and participates in a job readiness and support program for people with addiction issues. Although he was exempt from job search because of his participation in the program, DTA stopped his benefits when he did not complete the job search form. An advocate intervened and got his benefits restored. Mr. R's benefits would not have been stopped if DTA had met its duty to conduct a screening and assessment before mandating job search.

- Sally F (not her real name) is homeless woman with a history of mental illness. She usually sleeps on the street. When she got the job search form she tore it up and has been told that she will be disqualified from SNAP. She should be exempt based on her disability but DTA did not do any screening to determine if she was disabled. Although Ms. F does not acknowledge her mental impairment, DTA could readily have determined that she is too impaired to work. Because DTA has made job search mandatory and did not screen her to determine if she might be exempt, Ms. F is no longer receiving SNAP benefits, and is even less able than before to meet her basic food needs.

Denying SNAP aggravates food insecurity, hunger, and health problems; puts pressure on food banks, food pantries, and other feeding programs and on shelters; creates additional work for overburdened case managers; and causes even greater hardship for these very low income households. Because almost all of the benefits are spent locally, cutting people off SNAP takes money out of our lowest income communities. These negative effects are completely unnecessary since the state is not required to impose job search requirements. Nor does this harsh policy save the state money, since SNAP benefits are 100% federally funded.

We urge that DTA immediately cease making job search mandatory and instead operate a voluntary employment and training program as authorized by federal law and as the agency did previously.

We hope to hear from you with a date certain for the return to a voluntary program.

Thank you,

Georgia Katsoulomitis, Executive Director
Massachusetts Law Reform Institute

Joseph P. Diamond, Executive Director
MASSCAP

Elisabeth Jackson, Executive Director
Bridge Over Troubled Waters

Eva Millona, Executive Director
Massachusetts Immigrant and Refugee Advocacy
Coalition

Justin Pasquariello, Executive Director
Children's HealthWatch.

Rebekah Gewirtz, Executive Director
Massachusetts Public Health Association

Elisabeth Babcock, MCRP, Ph.D., President and CEO
Crittenton Women's Union

Ellen Parker, Executive Director
Project Bread

Andrew Morehouse, Executive Director
The Food Bank of Western Massachusetts

Julie LaFontaine, Executive Director
The Open Door

Catherine D'Amato, Executive Director
Greater Boston Food Bank

Joan Cirillo, President and CEO
Operation A.B.L.E. of Greater Boston

Carolyn Benedict Drew, President and CEO
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