

Boston/Quincy DTA Advisory Board

Amy Kershaw, Commissioner
Department of Transitional Assistance
600 Washington Street
Boston, MA 02111

June 29, 2021

Dear Commissioner Kershaw,

On June 23rd the Boston/Quincy DTA Advisory Board held an emergency meeting to discuss the Department's planned "reopening" and the limited services being provided to DTA clients. The Board meeting was robustly attended, we had a quorum and voted unanimously to send you this communication.

We wish to note that the Advisory Board deeply appreciates Department's extraordinary efforts during COVID to rapidly pivot to remote work so that DTA staff had the tools to work remotely; DTA's investment in improvements to DTACONnect for online applications and case access; DTA allowing telephonic applications for SNAP and cash benefits, and DTA's adoption of so many federal waivers options to maximize benefits to needy households and minimize paperwork barriers. Again, we thank you for your truly amazing efforts during this most difficult period.

Nonetheless, as the Boston/Quincy DTA Advisory Board, we are concerned about DTA's planned reopening with the very limited consumer access being offered to DTA clients, including a) the lack of in-person access to SNAP or cash case workers for consumers unable to successfully communicate online or by phone and b) the lack of in-person access to EBT cards. DTA's reopening of local TAO offices are inconsistent with the Governor's lifting of the broad public health emergency declaration and reopening of sister-state agencies that are providing in-person services to Massachusetts residents, including the Mass Registry of Motor Vehicles, the Mass Lottery Commission and the Mass Dept of Early and Secondary Education's Office of Educator Licensure. Yet the Department appears to be starting down a path which must be widened to full, in-person access at the earliest possible moment, otherwise it will treat the lowest income consumers who may have greatest needs for in-person access to significantly inferior state services.

As your Boston/Quincy TAO Advisory Board, we feel it is our obligation to speak up and share our concerns. And although our board provides formal advice for the Boston/Quincy offices only, we strongly recommend that our comments and advice in this letter be applied to TAOs statewide.

As you know, DTA serves the lowest income and most vulnerable residents within the Commonwealth. Many DTA consumers:

- do not have reliable cell phones, unlimited cell minutes, mobile devices to access online services, IT skills to use such devices, and/or reliable or safe addresses to receive mail.
- have limited literacy skills, are limited English speaking, and/or are living with disabilities including cognitive impairments that make it hard if not impossible to navigate telephonic or online options available and simply need in-person services.

- are experiencing homelessness, recently were incarcerated, and/or living in doubled-up situations but not connected with community- based organizations or shelters with sufficient staff to provide secure “mail room” services. They often move frequently, or live in doubled-up situations or with roommates or abusers who may attempt to control their inbound mail. Indeed, DHCD frequently moves families experiencing homelessness between Emergency Assistance shelter placements with minimal notification, without the ability to forward DTA mail, which is expressly not forwardable.

We understand the need for DTA to reopen local offices in a phased approach and we support all efforts to ensure local DTA offices are operated in such a way to protect the health and safety of both state workers and consumers. However, it is critical that all DTA consumers have the choice about whether to go to a local DTA office to apply in person, by phone or online. It is critical that DTA consumers have the choice to not only drop off or scan their documents, but to speak with a DTA worker to find out if the documents they are bringing are the correct ones.

We are equally concerned about DTA’s removal of all EBT printing machines from local offices and DTA’s plan to not provide EBT cards at local offices – with the exception of “emergency EBT cards” that local offices will provide in extremely limited or “dire” circumstances. At the Board meeting, Regional Director Sean Beasley noted that the “dire” circumstances would be decided on a case-by-case basis, and that homeless households would likely not qualify. We are concerned that, notwithstanding DTA’s recently issued reopening guidance, DTA consumers will face very subjective determinations of who is “worthy” of getting an emergency EBT card – a policy is ripe for explicit or implicit bias to prevail.

Households have faced delays in access since the pandemic began – but just because those delays have been in place during a crisis does not mean they should stay in place as we move forward. The Department has been focusing on decreasing the role of bias, racism, and stereotypes in how policies play out in the lives of our mutual clients. We are deeply disappointed that approach was not used in determining the scope of in-person services that would be available and especially in DTA’s EBT card policy decision. The current reopening policies undercut the Department’s six-year long focus on improving customer service and access, and ensuring clients feel dignified and respected when engaging with DTA.

We firmly believe that DTA must maintain the option of full in-person services for the constituencies DTA is obligated to serve.

Sincerely,

Lindsey Daley, Jewish Family and Children’s Service Bet Tzedek Legal Services, DTA Advisory Board Co-Chair

Kathleen DiBona, Health Imperatives, DTA Advisory Board Co-Chair

Roxanne Reddington-Wilde, ABCD, DTA Advisory Board Secretary

Kelly Turley, Massachusetts Coalition for the Homeless, DTA Advisory Board Treasurer