

March 10, 2015

The Honorable Thomas J. Vilsack
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20010

The Honorable Charlie Baker
Governor of Massachusetts
Massachusetts State House
Office of the Governor
Room 105
Boston, MA 02133

Dear Secretary Vilsack and Governor Baker,

On behalf of Children's HealthWatch, we are writing to request your help in protecting the Commonwealth's most vulnerable citizens: its children. The Supplemental Nutrition Assistance Program (SNAP) is a vital nutritional resource for our patients at Boston Medical Center and their families. We are deeply concerned, however, with the changes the Department of Transitional Assistance (DTA) hastily implemented in 2014 that have resulted in erroneous case closures and erroneous application denials of critical federal nutrition benefits.

As pediatricians, we know the negative health and development impacts created by food insecurity undermine the future of our very young patients. We also know that this condition is remediable through participation in effective programs such as SNAP. In many ways, SNAP serves as a vaccine for these children by ensuring that they are protected from the harmful effects of food insecurity.¹

We are alarmed to learn from USDA data that the SNAP caseload has declined by more than 7.7 percent from December of 2013 when the Massachusetts unemployment rate has declined by only 1 percent and there is no evidence that low income households are bounding back as rapidly. Massachusetts is turning away over \$10 million in SNAP benefits every month and failing to provide thousands of families with SNAP who rely on this vital source of food to keep their children healthy.

In the past few months, we have seen this play out on the bodies of our patients. For example, a mother of a toddler diagnosed with Failure to Thrive had her SNAP case closed in October 2014 because of a wage match from 2012 stating that she received wages from a company that she never worked with in

¹Ettinger de Cuba S, Weiss I, Pasquariello J, Schiffmiller A, Frank D, Coleman S...Cook J. SNAP Vaccine. Children's HealthWatch, 2012. Retrieved from http://www.childrenshealthwatch.org/wp-content/uploads/snapvaccine_report_feb12.pdf

2012. Despite the fact that the mother reported to DTA her current income, and provided DTA with the required proof of current income for her SNAP case, she was cut-off SNAP benefits for failure to provide verification for a job she never held 2 years earlier. The mother had no idea what was expected of her or why this erroneous employment document had any bearing on her current eligibility. The family went without SNAP for 2 months. During that time, the toddler lost weight, putting him at increased risk of negative health effects and developmental delay. The Outreach Worker in the Boston Medical Center Grow Clinic worked with this family for two days, calling the local DTA office only to find clogged phone lines and case workers unwilling to work with the family to reopen the case. Finally, her case was reinstated only after the mother reapplied for SNAP benefits, but only after months of her child missing out on critical growth of their brain and body.

We recently learned of another family who was cut off of SNAP in October 2014 when DTA implemented their Business Process Redesign. This mother was due for a recertification and sent in the necessary paperwork and all required documents. She never heard back about the status of her case so she called her caseworker over and over leaving messages that were never returned. Finally, she received an automated message informing her that the number to the caseworker's desk was no longer in service. She was not made aware of the updates to the phone system and SNAP caseload made during the Business Process Redesign, so she took a day off of work to visit the local DTA office. After waiting for hours and feeling mistreated by the staff in the reception area, she finally left. Her recertification was never processed and she has been without benefits since October 2014. Recently, Vicky Negus at Massachusetts Law Reform Institute intervened to resolve the case and learned that the mother had a wage match claiming she was receiving stipends from the company where she currently works, even though she informed the DTA of change in earnings and reported her current income. Even with full-time wages, this family is still eligible for SNAP, but has not received benefits for months because the case was not updated with the correct information.

We are concerned that families that do not have an outside advocate never get through the DTA system and go weeks or months without benefits, or get discouraged and give up. We are seeing an uptick in requests for emergency food from our food pantries, confirming our worst fears. The families losing SNAP benefits are financially eligible but DTA has created a system that is too difficult for families to navigate and excessive verification demands for information that has no bearing on current eligibility.

The decision to rush into a major modernization redesign in 2014 coupled with what appears to be extreme demands for verifications of out-of-date information, and automated case closures due to unfiltered data matching is extremely troubling. Requiring families to provide documentation for jobs worked in the past are not only excessive and unnecessary, but impact child health by increasing caregiver stress and, after a cut-off, depriving children and parents of the essential nutrients.

We urge the Baker Administration to investigate the thousands of SNAP case closures in Massachusetts, end automatic closures of cases due to data matching, and look to other means tested programs for guidance on successfully enrolling and retaining eligible participants. We bring this information to your attention because we are frustrated with the current system and the lasting impact it will have on the health of our very young patients.

Sincerely,



Deborah A. Frank, MD



Alan Meyers, MD, MPH



Megan Sandel, MD, MPH

Boston Medical Center
Department of Pediatrics
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Children's HealthWatch

cc. Massachusetts SNAP Coalition

Secretary Marylou Sudders
Executive Office of Health and Human Services

Thomas Massimo, Acting Commissioner
Department of Transitional Assistance

Kurt Messner, Acting Administrator
Food and Nutrition Service

Mayor Martin Walsh
City of Boston