



January 23, 2015

Deputy Assistant Commissioner for Policy, Program and External Relations
Department of Transitional Assistance
600 Washington Street
Boston, Massachusetts 02111

Re: DTA's Proposed TAFDC Regulations

Dear Ms. Stuart,

Thank you for the opportunity to submit comments on the Proposed Amendment of Regulations for the Transitional Aid to Families with Dependent Children program (Regulations). On behalf of Single Stop, we respectfully submit these comments and recommendations for your consideration and exploration.

Single Stop is a national nonprofit organization dedicated to helping low-income families and individuals build economic security by securing access to resources such as free tax preparation, legal services, financial counseling, and public benefits. In Massachusetts, Single Stop partners with Bunker Hill Community College, Roxbury Community College, and Springfield Technical Community College to assist college students access the safety net and thereby help them complete their post-secondary education.

Single Stop commends the DTA on the expansion of the definition of an education or training activity for the purpose of meeting the work requirement. Including the participation in certificate or degree programs from four-year degree granting higher education institutes, community colleges, or certificate programs for a period of 24 months in the definition will help more students keep their benefits while they use education and training to improve their lives.

However, data shows that 24 months is not sufficient time for college students to attain a degree. In Massachusetts, the average time for full-time student to complete a "2-year" degree is 3 years, and the average time to complete a "4-year" degree is 4.3 years¹. For low-income students, particularly single parents, time to completion is even longer. In light of that, the regulations should be clear that DTA *shall* extend the 24-month duration where the recipient is making substantial progress. Discontinuing benefits of students who are part-way into completing a degree would undermine their financial stability, threaten their ability to graduate, and endanger their pathway out of poverty.

¹ Complete College America: College Completion Data, Massachusetts. <http://completecollege.org/state-data-loader/?state=Massachusetts>.



As the DTA considers the new Regulations and their implementation, Single Stop urges you to consider the following:

Recommendation #1: Make the process for providing proof for whether a person is making substantial progress towards the completion of a certificate or degree program as simple as possible, and provide for approval of an extension where that proof is provided.

Analysis: By using the word, “may,” the Regulations do not provide sufficient guidance about when an extension will be granted. To ensure predictability for students and to avoid a perception that the decisions are arbitrary, the Regulations should provide that the DTA “shall” extend the 24-month limit if a student is making substantial progress towards completion of their program. In determining whether the student is making “substantial progress,” DTA should take into consideration that many students have gaps in their education. Additionally, the verification process should not be burdensome in order to avoid an interruption in benefits for students who meet the requirements.

Recommendation #2: Eliminate the changes to the standard for determining a chronic disability.

Analysis: The DTA should retain the current standard for determining a chronic disability rather than implementing the changes proposed in the Regulations. The current state standard allows for people with chronic impairments that are severe but do not meet the Federal SSI standard to be exempted from the work requirement. The state standard serves a different purpose than SSI, and implementing the proposed change that requires disabled recipients to meet the SSI standard would be a disservice to the estimated 3,000 disabled parents in Massachusetts who will lose their exemptions from the work requirement. The change would be particularly burdensome to low-income, disabled college students for whom the exemption is critical to getting the education they need.

Recommendation #3: Require cases to be approved in 30 days, even if proof of job search is not yet complete.

Analysis: Recipients that do not meet exemptions and are required to provide proof of job search should continue to receive their benefits within 30 days. The Regulations do not provide for benefits in the 60-day job search period despite the fact that state statute requires a benefit determination within 30 days. Low-income students have chosen to get an education as the best way to support themselves and their families and requiring proof of job searches is an extra burden that can destabilize the family at a time when they are seeking financial stability. This burden can be minimized by providing benefits in the 30-day period and not depriving eligible families of cash assistance as a source of income.

Recommendation #4: Grant waivers for the vehicle value limit for students to get to school.

Analysis: The change in law increased the vehicle value limit to \$15,000, but the Regulations are unclear about when waivers to this limit may be granted. The Regulations stipulate that “if it is determined that the specific vehicle is necessary for a particular employment or family circumstance,” the DTA will grant

Single Stop

1825 Park Ave, Suite 503 ♦ New York, NY ♦ 10035

Phone: (212) 480-2870 ♦ Fax: (212) 480-2871

www.singlestop.org



a waiver. The Regulations should be clearer about what this means, and allow waivers to be granted if a vehicle is needed to get to school or a training program, as well as to work and medical care.

Again, we appreciate the opportunity to comment on the DTA's Proposed Amendment of Regulations for TAFDC.

Sincerely,

Andrew Stettner
Chief Program Officer
Single Stop

Single Stop

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