



March 13, 2015

Kevin Concannon, Under Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, D.C. 20010

Ted Mitchell, Under Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Under Secretaries Concannon and Mitchell:

We are writing to express our concern with the state of Massachusetts' handling of SNAP cases for low-income community college students. Through our Single Stop sites we have learned that low-income students in Massachusetts may be losing access to their Supplemental Nutrition Assistance Program (SNAP) benefits as an unfortunate product of recent modernization changes to SNAP, in particular the application of data matching.

Single Stop is a national nonprofit organization dedicated to helping low-income families and individuals build economic security by coordinating access to resources such as public benefits, free tax preparation, legal services, and financial counseling. In 2009, we launched the Community College Initiative to increase completion rates of low-income community college students by addressing financial barriers. We have sites in approximately 23 community colleges in 8 states (NY, NJ, CA, MA, LA, PA, MS, and FL) including three community college sites in Massachusetts. Single Stop community college sites enable students to tap into existing unspent federal and local resources that can be used as a supplemental form of financial aid. We help students access benefits like SNAP so that they are able to stay on course to graduate.

We are writing to you because we have learned from our affiliate at Bunker Hill Community College in Boston that their low-income students—whose financial situations have not changed—are routinely losing access to their SNAP benefits. The state agency is apparently relying on inaccurate or unfiltered wage matches that include non-countable Title IV work study income. This income is being counted on SNAP budgets rather than being exempted as provided by federal law. Wage matches are being sent and cases closed, without being checked for the source of income by caseworkers against the client profile. The unfortunate result is that students are coming to class hungry and often confused as to why the state has closed their cases.

**Single Stop**

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SNAP applicants that our Bunker Hill College program assists provide verification in the application that they receive Title IV work study (in fact, receipt of work study is often the basis of their SNAP student eligibility). Nonetheless, the SNAP state agency has been closing the SNAP case unless the student produces a letter of termination from an employer or four wage stubs. In one case reported to us, the Bunker Hill Community College student complied with sending in four work study wage stubs and her SNAP benefits were then incorrectly reduced because the income was counted.

This issue is even broader than wage matches related to work study income. A larger problem of unfiltered wage matches that do not comport with federal SNAP policy on the treatment of income and SNAP budgeting exists and is harming students. Some students who work part-time at non-work study jobs are also getting matches even though they reported their earnings to DTA, which results in them losing benefits that they are entitled to. The state agency does not appear to follow required protocol for investigating "questionable information" by doing an individual case review or offering any worker assistance as required under SNAP policy and instead automating closure.

Attached is a letter from Kathleen O'Neill, our Single Stop site coordinator at Bunker Hill which was sent to your FNS Regional Office as well as Congressman Capuano and Mayor Walsh involving students who have sought her help late in 2014. We understand even more erroneous SNAP terminations have occurred. The FNS Regional Office did respond to Ms. O'Neill in February and confirmed that Title IV work study is non-countable income. FNS also noted that when information appears "questionable," the SNAP state regulations place a duty on the SNAP worker to actually review the individual case record and determine if the information is inconsistent with information reported by the SNAP client. From what we understand, none of this is happening in Massachusetts.

USDA SNAP participation data shows that the Massachusetts SNAP caseload declined by more than 38,000 SNAP cases from December 2013 to December 2014 at a decline rate of -7.7%, while the national average SNAP caseload decline was only -0.2%. The state's unemployment rate declined by only 1% during the same period. The Massachusetts SNAP decline rate is alarming, and we fear that low-income students are getting swept up into this wide scale and overly broad matching.

We strongly urge USDA to investigate what is happening in Massachusetts. Our low-income students desperately need the SNAP benefits while in school. We urge USDA to ask Massachusetts to suspend or amend these data matches related to work study and other wages and to identify and rectify all SNAP cases closed or denied benefits in the past 12 months, based on these wage matches.

Sincerely,

Andrew Stettner  
Chief Program Officer  
Single Stop

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