

May 24, 2012

Sharon L. Summers
Planning and Policy Development Unit
Division of Social Services
1901 North DuPont Highway
P.O. Box 906
New Castle, DE 19720-0906

RE: DSS Proposed Child Care Subsidy Program Definitions Reg. [15 DE Reg. 1551 (May 1, 2012)]

Dear Ms. Summers:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Social Services (DSS) proposal to amend the definitions used in its Child Care Subsidy Program. The Summary of Proposed Changes section recites that the rationale for the amendments is twofold: 1) federal prompting to add a definition of "children in families with very low income"; and 2) the desire to reformat and alphabetize the existing list of definitions. The GACEC **endorses** the proposed regulation subject to adoption of the technical corrections listed below.

First, the new definition of "children from low income families" is acceptable. At 1557. It adopts a "200% of the Federal Poverty Limit" standard which mirrors the existing standard reflected in the definition of "income limit". At 1554.

Second, in the definition of "Child", Council recommends the following amendment: "...or are in need of protective services."

Third, in the definition of "Child Care Centers, 41", Council suggests amending the example to read as follows: "(Example: One child is a citizen and one is not. The citizen child is a 41)." This would then be identical to the superseded version. At 1553.

Fourth, in the definition of "Child Care Certificate", second sentence, substitute "parents who wish" for "a parent who wishes" since the following pronoun ("their") is plural.

Fifth, in the definition of "Educational Program", the semicolons are omitted and the word "or" is omitted after Par. "4". Compare the current definition. At 1553-1554.

Sixth, in the definition of "Physical or Mental Incapacity", DSS deleted the term "dysfunctional". Compare the existing definition. At 1555. This conforms to Title 29 Del.C. §608 and merits our endorsement.

Thank you in advance for your time and consideration of our position and comments. Should you have any questions or concerns, please feel free to contact me or Wendy Strauss at the GACEC office.

Sincerely,

Terri A. Hancharick
Chairperson

TAH:kpc