

May 28, 2013

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

**RE: DSS Proposed Food Supplement Program Time Limit Regulation [16 DE Reg. 1143 (May 1, 2013)]**

Dear Ms. Summers:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Social Services (DSS) proposal to revise its Food Supplement Program standards in the context of time limits for "Able-bodied adults without dependents". The rationale is "to make the rules easier to understand and follow", to add a federal citation and to change the name of the section to more accurately reflect the content of the policy.

The revised regulation generally conforms to the federal regulation, 7 C.F.R. §273.24. The federal regulation implements a federal law limiting receipt of "food stamp" benefits to three months in a 36-month period for "able-bodied adults without dependents" (ABAWDs) who are not working or who are not exempt. See attached USDA summary. The GACEC endorses the proposed regulation subject to consideration of a minor revision to §9018.2, Section 4, as follows:

Good cause includes circumstances beyond the individual's control, such as, but not limited to: ... This would clarify that the subsequent list is illustrative only and more closely conform to the analogous federal standard, 7 C.F.R. §273.24(b)(2).

Thank you for your time and consideration of our comments and recommendations. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Terri A. Hancharick  
Chairperson

TAH:kpc

Enclosures