

June 26, 2014

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

RE: DSS Proposed Food Supplement Program Unearned Income Verification Regulation [17 DE Reg. 1140 (June 1, 2014)]

Dear Ms. Summers:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Social Services (DSS) proposal to amend its Food Supplement Program standards for verification of unearned income.

DSS recites that federal regulations give state agencies the option of using an Income and Eligibility Verification System (IEVS) to verify income when determining eligibility for benefits and the amount of benefits. DSS is opting to not utilize the IEVS system to obtain information on unearned income. Instead, "DSS will continue to use alternative methods to document and verify unearned income." At 1140. Both earned and unearned income are considered when assessing eligibility. See 16 DE Admin Code 9054-9057.

The justification for using unearned income verification sources other than the federal IEVS may be based on cost, accuracy of information, or difficulty in acquiring information. The rationale for opting to use "alternative methods" to verify unearned income is not provided in the regulation; therefore, Council is unable to offer definitive comments or support for the proposed amendment.

Thank you for your time and consideration in reviewing our observations. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Terri A. Hancharick

TAH:kpc