



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904
302-739-4553 (voice) 302-739-6126 (fax) <http://www.gacec.delaware.gov>

February 29, 2024

Division of Social Services
1901 North DuPont Highway,
P.O. Box 906,
New Castle, Delaware 19720-0906

RE: 27 DE Reg. 577 [DHSS Proposed Food Benefit Certification Regulation (February 1, 2024)]

To Whom It May Concern:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Health and Social Services (DHSS)/Division of Social Services (DSS) proposal to amend the Delaware Social Service Manual (DSSM) regarding Food Benefit Certification for Supplemental Nutrition Assistance Program (SNAP). The proposal changes section 9068 from a 24-month certification period to a 12-month certification period in households where all members are elderly or disabled, and from a 12-month to a 6-month certification period for all other households. The GACEC **opposes** the proposed changes to the frequency of the review periods and recommends that DHSS maintain 24-month certification/12-month certification periods.

The DHSS proposal is contrary to federal SNAP policy that strongly favors longer certification periods. The proposed change also creates barriers to food equality and significantly harms the very individuals that SNAP is designed to help - low-income households, especially families of color, facing food insecurity. SNAP is also an important benefit for people with disabilities. A recent Center for Law and Social Policy (CLASP) article notes that ten percent of non-elderly SNAP recipients identify as having a disability and people with disabilities are also more likely to face food insecurity.

The proposed changes will result in many eligible families losing SNAP benefits and runs counter to the federal government's stated policy goals of increasing enrollment by streamlining application and renewal processes and generally trying to reduce unnecessary churn (when a household exits SNAP and then re-enters the program within four months). See for example 87 Fed. Reg. 54760 (Sept. 7, 2022) (proposing multiple changes to simplify Medicaid applications and renewals).

The Proposed rule will also increase the administrative burden on both SNAP recipients and the State by doubling the number of reviews that must be conducted.

Making SNAP benefits more accessible is a racial justice issue. It is well established that families of color endure the most issues with hunger in America. Adopting policies that restrict or reduce eligibility will have a disproportionate effect on those families. Food insecurity also plays an important role in physical and mental health. Delaware should not adopt policies that only worsen food insecurity. A recent report, co-authored by CLASP in collaboration with the Community Partnership Group (CPG) recommends longer certification periods. It also addresses the consequences of short certification periods: "These short certification periods add burden and create more opportunities for human error, causing families to lose their benefits. One year renewal periods - nothing less - should be the national standard."

SNAP is the nation's largest mechanism to fight hunger and is 100% federally funded. Delaware should be seeking to increase not decrease enrollment of eligible families. The proposed changes will do precisely the opposite.

Thank you for your time and consideration of our opposition and observations. Please feel free to contact Pam Weir or me should you have any questions.

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc