



**GOVERNOR'S ADVISORY COUNCIL FOR EXCEPTIONAL CITIZENS (GACEC)
GENERAL MEMBERSHIP MEETING
7:00PM October 21, 2025
VIRTUAL MEETING**

MEMBERS PRESENT: Al Cavalier, Nancy Cordrey, Bill Doolittle, Karen Eller, Ann Fisher, Molly Merrill, Maria Olivere, Trenee Parker, Erika Powell, Jennifer Pulcinella, Stefanie Ramirez and Brenné Shepperson.

OTHERS PRESENT: Mary Andrews, Chris Budesheim, Harley Doolittle, Mindi Failing, Laura Hattier, Dale Matusevich/Delaware Department of Education (DDOE), Deb Monhollan (ASL Interpreter), Theresa Muschiatti (ASL interpreter)

STAFF PRESENT: Pam Weir/Executive Director, Kathie Cherry/Office Manager, Lacie Spence/Administrative Coordinator and Theresa Moore/Administrative Support Specialist.

MEMBERS ABSENT: Tika Hartsock, Kristina Horton, Thomas Keeton, Jessica Heesh Mensack, Beth Mineo and Meedra Surratte

ADMINISTRATIVE BUSINESS/MOTIONS:

1. Call to Order

Bill Doolittle called the October meeting of the Governor's Advisory Council for Exceptional Citizens (GACEC) to order at 7:03 PM.

Lacie Spence confirmed that a quorum was present.

3. Approval of Agenda

Bill Doolittle presented a modified and expanded version of the meeting agenda, noting it was similar to the previously distributed version but included additional clarifications.

- Motion: To approve the expanded agenda.

- Moved by: Jennifer Pulcinella
- Seconded by: Ann Fisher
- Vote:
 - No objections. *(Karen Eller and Stefanie Ramirez were not present at the time of the vote.)*
- Result: Motion carried. The expanded agenda was approved.

4. Discussion: Parliamentary Procedure and Bylaws

Al Cavalier raised concerns regarding the lack of a formal parliamentary authority guiding Council meetings. He explained that during a previous Bylaws revision, the Council had removed Robert's Rules of Order, mistakenly believing it conflicted with the Delaware Freedom of Information Act (FOIA).

Mr. Cavalier proposed that the Council adopt Robert's Rules of Order as its governing procedural authority, except where inconsistent with FOIA or the Council's bylaws.

Discussion:

- Bill Doolittle clarified that such an adoption would require a bylaws amendment, as governance procedures are currently established within the bylaws.
- Al Cavalier asserted that the motion could be adopted without altering the bylaws.
- Bill Doolittle ruled the motion out of order, stating that procedural governance changes must occur through bylaw amendments.
- Bill Doolittle invited Al Cavalier to seek a full Council vote should he wish to challenge the chair's decision.

Maria Olivere suggested adding the discussion to the next Council meeting agenda as a priority item.

Bill Doolittle proposed establishing a Bylaws Review Committee to address this issue and other identified bylaw inconsistencies, such as procedures for calling special meetings.

Trenee Parker expressed support for prioritizing bylaw review, suggesting that the Council focus its attention on this task before proceeding with other committee work. Bill Doolittle agreed to prioritize bylaws but noted that standing committees' work cannot be suspended by a motion to prioritize other work, as their existence is defined in the bylaws.

- Motion: To establish a Bylaws Review Committee to examine and recommend updates to the Council's bylaws, including the consideration of adopting Robert's Rules of Order.

- Moved by: Trenee Parker
- Second by: Maria Olivere
- Vote:
 - No objections. *(Karen Eller and Stefanie Ramirez were not present at the time of the vote.)*
- Result: Motion carried.

Bill Doolittle invited members interested in serving on the committee to contact Pam Weir and himself. The committee's work will begin immediately and be fast-tracked for completion before the next full Council meeting.

5. Approval of Previous Meeting Minutes

a. June 17, 2025 – Full Council Meeting

Bill Doolittle introduced the minutes from June 17, 2025, Full Council Meeting for approval.

Discussion:

- Al Cavalier reported that he had submitted suggested edits to clarify language and ensure motions and actions were accurately recorded.
- Maria Olivere stated she had reviewed and supported the proposed edits.
- Motion: To approve June 17, 2025, minutes as amended per Al Cavalier's edits.
 - Moved by: Maria Olivere
 - Seconded by: Ann Fisher
 - Vote:
 - No objections. *(Karen Eller and Stefanie Ramirez were not present at the time of the vote.)*
 - Result: Motion carried. June 17, 2025, minutes were approved as amended.

b. July 15, 2025 – Special Full Council Meeting

Bill Doolittle moved on to the approval of the Special Full Council Meeting minutes from July 15, 2025.

- Discussion: None.

- Motion: To approve the minutes of July 15, 2025, Special Full Council Meeting.
 - Moved by: Ann Fisher
 - Seconded by: Molly Merrill
 - Vote:
 - No objections. (*Karen Eller and Stefanie Ramirez were not present at the time of the vote.*)
 - Abstention: Al Cavalier (not present at that meeting).
 - Result: Motion carried. The July 15, 2025, Special Meeting minutes were approved.
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c. September 16, 2025 – General Membership Meeting

Bill Doolittle introduced the minutes for the September 16, 2025, General Membership Meeting, noting that this meeting occurred prior to the Council's retreat.

Discussion:

- Al Cavalier expressed concern that the minutes only reflected the opening and closing of the meeting and did not include substantive discussion from the retreat portion that followed. He asserted that, under Delaware FOIA, the retreat constituted a public meeting since Council members discussed Council business, including barriers to impact and strategies for improvement.
- Bill Doolittle responded that the formal business portion of the meeting was distinct from the retreat and that minutes were prepared only for the official session. He clarified that the Council does have retreat minutes and offered to bring them forward for approval at the November 2025 meeting.
- Bill Doolittle added that the Council would seek written clarification from the Delaware Public Integrity Commission regarding how FOIA applies to retreats and similar gatherings.
- Al Cavalier reiterated his interpretation of FOIA and maintained that the retreat constituted a public meeting. Chair Bill Doolittle replied that prior conversations with the Commission director had indicated otherwise but agreed that a formal written opinion would be beneficial to ensure compliance.

Action: Bill Doolittle committed to bringing the retreat minutes to the November 2025 meeting for review and possible approval.

- Motion: To approve the minutes from the business portion of the September 16, 2025, meeting.
 - Result: No motion was made.
 - Outcome: September 16, 2025, meeting minutes were tabled until a future meeting.
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6. Financial Reports

Bill Doolittle introduced the July, August, and September 2025 financial reports, proposing to review and approve them as a group unless there were objections.

Discussion:

- Maria Olivere questioned discrepancies between the July figures presented in the July report and the same figures reflected under July in the August and September reports.
- Bill Doolittle deferred the question to staff. Upon review, it appeared that the July report reflected data from the wrong fiscal year (FY24 instead of FY25).
- Bill Doolittle directed that the July report be tabled until the correct version could be provided.
- The August and September 2025 financial reports were reviewed and found to be accurate.
- Motion: To approve the August and September 2025 financial reports.
 - Moved by: Jennifer Pulcinella
 - Seconded by: Maria Olivere
 - Vote:
 - No objections. *(Karen Eller and Stefanie Ramirez were not present at the time of the vote.)*
 - Result: Motion carried. The August and September 2025 financial reports were approved.
 - Action: The July 2025 report was tabled pending correction.

7. Leadership Committee Motions

Bill Doolittle presented four motions previously approved by the Leadership Committee and requested a motion from the Full Council to affirm those actions.

Discussion:

Council members expressed a desire to receive the motions in writing prior to the General Meeting to allow sufficient time for review and preparation for voting. Members were generally supportive of distributing a comprehensive Council meeting package in advance, containing all relevant information needed for informed decision-making.

Outcome:

No motion was made.

8. Support for Senate Bill 198

This legislation represents a critical step forward in ensuring that Delawareans with disabilities receive the full protection they deserve. By explicitly adopting the safeguards of Section 504 of the Rehabilitation Act of 1973 and its implementing regulations as they exist on January 1, 2025, SB 198 provides broad, consistent, and enforceable protections under state law.

Motion comes from the Policy and Law Committee to write a letter in support of Senate Bill 198.

- Vote:
 - No objections. (*Brenné Shepperson was not present at the time of the vote.*)
 - Molly Merrell, Maria Olivera, and Trenee Parker abstained
- Result: Motion carried to send a letter of support for Senate Bill 198.

9. Redding Consortium Letter

Bill Doolittle asked Council to send out a letter he had written to the Redding Consortium.

Discussion:

- Maria Olivera asked to review the reworded letter before it is sent and suggested allowing one day for additional feedback.
- Bill Doolittle agreed to circulate the finalized draft after revisions are made and comments are incorporated. Members will have one day to provide any final input before the letter is submitted, with the goal of sending it by the end of the week. Requested that members be prompt with any comments.
- Motion: Bill Doolittle requested a motion to approve sending a cleaned-up version of the letter, including any additional items or feedback from Council to the Impact Committee through the co-chairs, on behalf of the Council (not solely the Chair).

- Moved by: Jennifer Pulcinella
- Seconded by: Maria Olivero
- Vote:
 - No objections. (*Brenné Shepperson was not present at time of the vote.*)
 - Trenee Parker abstained
- Result: Motion carried. Council will send the revised letter as discussed.

10. Establish a Council Evaluation and Improvement Workgroup

Discussion:

- Al Cavalier introduced a motion to establish a Council Evaluation and Improvement Workgroup to conduct a comprehensive evaluation of the barriers and facilitators affecting the Council's operation and impact. The workgroup will prepare an evaluation report with recommendations for improvement to be delivered to the Council membership and staff by May 1, 2026
 - Al Cavalier proposed that Molly Merrill, Trenee Parker, and Jessica Mensack serve as the core members of this workgroup, with the authority to invite additional participants as deemed necessary based on their expertise and system knowledge. He noted possible individuals who may be invited, such as Wendy Strauss (to represent staff perspectives) and Terry Hancharik (a former Council Chair who could provide external objectivity).
 - Motion: "I move that a Council evaluation and improvement workgroup be established to conduct an evaluation of the barriers and facilitators of the Council's operation and impact and to compose an evaluation report with recommendations for improvement. Based on their "systems" knowledge and relevant experience I further move that Molly Merrill, Trenee Parker, and Jessica Mensack serve on this group, with the authority to invite other persons as they deem necessary. I further move that they deliver their completed report to the Council membership and staff by May 1, 2026."
 - Moved by: Al Cavalier
 - Seconded by: Ann Fisher
 - Vote:
 - No objections. (*Brenné Shepperson was not present at the time of the vote.*)
 - Trenee Parker abstained
 - Result: The motion passed. The Council Evaluation and Improvement Workgroup was formally established.
Members Molly Merrill, Trenee Parker, and Jessica Mensack will serve as core members, with authority to invite additional individuals as necessary. The workgroup will deliver a report with recommendations for Council improvement by May 1, 2026 and provide interim updates as appropriate.
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PUBLIC COMMENTS: There were no public comments tonight.

COMMITTEE REPORTS:

POLICY AND LAW COMMITTEE: The Committee met tonight and reviewed the Legal Memo dated October 14th. The Legal Memo can be found at the end of the minutes. Council approved submitting letters based on analysis provided in the DRD legal memo on 29 DE Reg. 267 and 29 DE Reg 277.

You can find a copy of Council's letters in reference to this legal memo at the following links on the [GACEC website](https://gacec.delaware.gov):

- Regulatory letters, visit <https://gacec.delaware.gov/regulatory-letters/>.
- Legislative letters, visit <https://gacec.delaware.gov/legislative-letters/>.

INFANT AND EARLY CHILDHOOD COMMITTEE: The group met to discuss current activities in the Birth to 3 areas of support and to review goals for the upcoming year.

- **Goals:**
 - The team reviewed proposed goals.
 - Overall, the group agreed to maintain the same goals as the previous year, with minor adjustments and possible additions.
- **Joint Meeting with ICC:**
 - The group emphasized the need to schedule a joint meeting with the Interagency Coordinating Council (ICC), as required by both Councils.
 - The meeting may take place after the first of the year; specific timing is to be determined.
 - Members agreed that this collaboration would be mutually beneficial and strengthen coordination between the two groups.

CHILDREN AND YOUTH COMMITTEE: The Children and Youth Committee report out from Al Cavalier. Tika Hartsock will continue as Children and Youth Committee Chairperson for FY 26.

Committee goals will be discussed and revised at the November meeting when Tika returns. The Committee discussed the range of negative effects caused by the very frequent lack of substantive response the Council receives from its requests to DDOE for data or clarification of policies. This lack of response impairs our efforts at positive change and frustrates our motivation to persist. It also is denigrating to the Council and implies that DDOE does not take the Council's concerns seriously, despite what they say.

The Committee also discussed possible strategies to alter this situation, such as discussing it with the Director of Exceptional Children Resources (ECR), notifying the Delaware Secretary of Education, notifying the Governor, notifying Office of Special Education Programs (OSEP), and writing an editorial in the local press. Each of these has its own challenges. This situation is frustrating.

ADULT AND TRANSITION SERVICES COMMITTEE: The group met to discuss enhancing Family Support and Transition Coordination

- **Serving Families in Transition:**

- The group discussed improving services for families during children's transition periods, exploring ways to create a more unified approach across programs and supports.
- The goal is to ensure families receive transition information early, well before children reach transition age.

- **Prison Education Update:**

- Pam Weir, GACEC Executive Director, reported that the Prison Education (Prison Ed) initiative will move back under the Adult and Transition Services Committee, as decided at the end of last year.
- Valuable information was gathered from recent Prison Ed Ad Hoc Committee meetings.
- A data request letter will be drafted to ensure updated and accurate information.
- Staff will prepare this letter for review and approval at the November Adult and Transition Services Committee meeting, and it will then be shared with the full Council for approval.

- **Joint ICC Meeting Coordination:**

- The group reiterated the need for a joint meeting with the Interagency Coordinating Council (ICC), which should occur twice a year per Council requirements.
- This joint meeting aligns closely with the Adult and Transition Services Committee's focus on early transition planning, reinforcing the idea of "beginning with the end in mind."
- Collaboration with ICC is expected to enhance continuity of services and supports for families across early intervention and transition stages.

DEPARTMENT OF EDUCATION REPORT:

Organizational Updates

- There have been rifts or disruptions within OSEP, affecting around 250 people.
- Despite this, IDEA remains fully in effect—the law and regulations governing special education services are unchanged.
- The Department is maintaining full operational capacity for IDEA oversight, supervision, and implementation.

Program and Funding Status

- IDEA funding (Part B – 611 and Part C – 619) was received on October 1, ensuring program continuity.
- The Department continues to work with Technical Assistance (TA) centers, including the IDEA Data Center, which supports data analysis and improvement initiatives with Local Education Agencies (LEAs).
- Data retreats for LEAs have been positively received, emphasizing data-driven decision-making.

Dispute Resolution and Parent Safeguards

- The Department has expanded dispute resolution capacity, adding new hearing panel members and complaint investigators.
- Parental rights and procedural safeguards remain unchanged.
- The contract with Special Education Dispute Resolution Services (SPARC) of the University of Delaware for IEP facilitation and mediation remains active.

Possible Federal Reorganization

- There are early reports of discussions about moving the Department of Education under the Department of Health and Human Services (HHS).
- Career and Technical Education (CTE) has already moved to the Department of Labor.
- A potential Office of Disability may be created under HHS, but this information is preliminary and unconfirmed.
- Further updates are expected after the National Association of State Directors of Special Education (NASDSE) conference next week.

CHAIR REPORT:

Staff Workload and Operations

- Operations have been temporarily scaled back to provide staff with time to complete existing tasks and reduce overload.
- The team is focusing on preparatory work for upcoming initiatives, particularly those related to work groups.
- The Chair emphasized coordination and collaboration across all sister entities, noting that “there’s more power in numbers.”

2. Coordination with the Public Integrity Commission

- The Council will draft formal questions to submit to the Public Integrity Commission for clarification on procedures and compliance matters.
- All members are encouraged to contribute questions they feel should be addressed.
- The goal is to obtain written guidance to replace prior verbal explanations, ensuring clarity and consistency in decision-making.
- The written responses will help define boundaries under open meeting laws and ensure the Council’s activities are fully compliant.

3. Process and Timeline

- The inquiry process may take two to three months, depending on the Commission’s acceptance and review of the questions.
- The Chair emphasized that this effort would help ensure all actions are transparent, ethical and legally sound.

DIRECTOR’S REPORT:

Council Monthly Meeting Information Package

The goal is to send committee members a monthly information package prior to full membership meetings so they can review, prepare and engage effectively. It is meant to prevent surprises and give context to the materials members receive.

Timing

- Sent 10–14 days before each full membership meeting.
- Includes most documents in advance, except for certain policy and law memos that arrive right before the meeting due to timing constraints.

Contents of the Package

1. Council Goals & Performance Measurements
 - Reminder of current objectives.
 - Provides context for reviewing other materials.
2. Meeting Agenda
 - Standard monthly agenda so members know discussion topics in advance.

3. Meeting Minutes
 - Minutes from prior meetings, as usual.
4. Financial Reports
 - Monthly financial information, as usual.
5. Membership Roster
 - Current roster with vacancy percentages.
 - Includes composition codes to foster discussion on representation or committee structure.
6. Committees & Ad Hoc Committees
 - Table with committee names, staff assigned and meeting dates.
7. Policy and Law Committee Materials
 - Draft legislation or regulations being reviewed.
 - Information submitted to Disability Rights Delaware (DRD) for legal analysis.
 - Provides context on current legal or policy issues before the memo is issued.
8. Department of Education Materials
 - Updates on old business, new business and data.
 - Information on high-priority issues and ongoing discussions.

Key Notes

- The package helps members review information on their own time before the meeting.
- The policy and law memo is an exception—received closer to the meeting due to the analysis process.
- The package is designed to consolidate information without overwhelming members with too many separate documents.

ADJOURNMENT: Maria Olivere made a motion that was seconded by Trenee Parker to adjourn the meeting. The motion passed and Bill Doolittle adjourned the meeting at 9:30 pm.

POLICY AND LAW MEMO

Memo

To: SCPD, GACEC and DDC

From: Disability Rights Delaware

Date: 10/14/2025

Re: October 2025 Policy and Law Memo

Please find below, per your request, analysis of pertinent proposed regulations identified by councils as being of interest.

- **PROPOSED Division of Health and Social Services (DHSS) Division of Medicaid and Medical Assistance (DMMA) Amendment to the Division of Social Services Manual**

(DSSM), 16 Del. Admin. C. § 1800, regarding Delaware Healthy Children Program, 29 DE REG. 267 (10/01/25)

This rulemaking proposes to amend DHSS regulations concerning the Delaware Healthy Children Program, which is Delaware's "CHIP" (Children's Health Insurance Program).

This Proposed Regulation seeks to amend the State Plan to bring it into compliance with requirements in the Federal Consolidated Appropriations Act of 2023 (CAA). This proposal is specific to the CHIP¹ program. The CAA included several provisions impacting access to state funded health services for incarcerated juveniles with Medicaid and/or CHIP. Prior to the CAA changes, while incarceration was not a barrier to eligibility for Medicaid², it was a barrier to CHIP. While any child can apply for and be found eligible for Medicaid during incarceration, that was not the case with CHIP. However, a child who was eligible for CHIP prior to incarceration would not lose eligibility during their period of continuous eligibility, even while incarcerated.

The CAA makes several significant changes to these rules. First, for Medicaid, it requires the state, in the 30 days prior to release or not later than one week or as soon as practicable after release, to provide any necessary screenings and diagnostic services in accordance with Early and Periodic Screening, Diagnostic and Treatment (EPSDT) requirements. In the 30 days prior to release and for at least 30 days after release, the state must provide targeted case management and referral services. These services can be paid for by the Medicaid program.

The CAA also requires that the state provide screening, diagnostic and case management services otherwise available under the CHIP state plan for 30 days prior to release. This creates an exception to the general rule that CHIP may not pay for services during incarceration.

Regarding eligibility, states are permitted to suspend or continue services rather than terminate CHIP coverage during incarceration. States may not terminate CHIP eligibility. States will also have the option to consider children awaiting trial as eligible for CHIP.³

The reasons for these changes are manifold. As with adults who are incarcerated, justice involved juveniles tend to have greater health needs, especially behavioral health needs. Juveniles will have greater success upon release if they are connected to all needed services, including targeted case management and robust referral services. Such interventions should lead to better health and more successful transitions to post-release life, including employment and education.

The proposed changes include a new definition:

"Eligible Juvenile" means an individual who is under 21 years of age who was determined eligible for Medicaid or CHIP in any eligibility group before becoming an inmate of a public institution or while an inmate of a public institution. This also includes the Former Foster care group ages 18 – 26.

It also adds a new section providing rules related to continuous eligibility during incarceration of juveniles:

¹ CHIP refers to the Children's Health Insurance Program, a joint federal and state program that provides health coverage to uninsured children in families with incomes too high to qualify for Medicaid, but too low to afford private or group health plan coverage. <https://www.medicaid.gov/chip/chip-eligibility-enrollment>;

² States may not use federal Medicaid funds to pay for services for incarcerated individuals who are eligible for Medicaid. Medicaid status is placed in suspension.

³ For a deep dive into these changes, please refer to the following: <https://www.medicaid.gov/federal-policy-guidance/downloads/sho24004.pdf>;

18800.3 Continuous Eligibility During Incarceration

-Children who are determined eligible for DHCP at initial application or renewal who later become incarcerated during a CE period must remain eligible for the duration of their CE period.

-The child's DHCP eligibility must be terminated during their CE period unless they experience another permissible exception to CE. See section 18800.1 Continuous Eligibility for Target Low-Income Children.

-Eligibility may no longer be terminated for otherwise-eligible children in DHCP at renewal if the only reason for the termination is that they are inmates of a public institution. See section 60100 Incarcerated Individuals Definitions.

It appears that there is a “NOT” missing from the second bullet point as demonstrated with brackets: “The child’s DHCP eligibility must [] be terminated during their CE period unless they experience another permissible exception to CE. See section 18800.1 Continuous Eligibility for Target Low-Income Children.”

Globally, these changes would promote more effective transition and medical services benefits juveniles with disabilities. There are other style edits made that are non-substantive.

Recommendation:

- 1) Council may wish to recommend that DHSS insert the word “not” in the brackets in the second bullet point of 18800.3 (“The child’s DHCP eligibility must [] be terminated during their CE period unless they experience another permissible exception to CE. See section 18800.1 Continuous Eligibility for Target Low-Income Children.”).***
 - 2) Council may wish to otherwise support the proposed regulatory amendment as these changes bring Delaware into compliance with the CAA and these changes would promote more effective transition and medical services benefits juveniles with disabilities.***
- **PROPOSED Division of Health and Social Services (DHSS) Division of Medicaid and Medical Assistance (DMMA) Amendment to the Division of Social Services Manual (DSSM), 16 Del. Admin. C. § 60000, regarding the Incarcerated Individuals Medicaid Program, 29 DE REG. 271 (10/01/25)**

In this proposed rulemaking DMMA/DHSS proposes to a new definition for the same reasons as discussed above, with respect to the Delaware Healthy Children Program. That definition is:

“Eligible Juvenile” means an individual who is under 21 years of age who was determined eligible for Medicaid or CHIP in any eligibility group before becoming an inmate of a public institution or while an inmate of a public institution. This also includes the Former Foster care group ages 18 – 26.

Recommendation: no action needed.

- **PROPOSED Division of Health and Social Services (DHSS) Division of Social Services (DSS) Amendment to the Division of Social Services Manual (DSSM), 1 Del. Admin C. §, 29 DE REG. (09/01/25).**

In this proposed rulemaking DHSS proposes to add an exception to income exclusions for the food benefit program:

9059 Income Exclusions for Food Benefits

This section lists the types of income excluded for the ~~Food Supplement Program~~ food benefits.

....

W. Exclude the following income when determining eligibility for food benefits.

Income excluded under TANF to only include:

1. Time-limited income for living expenses received based on need from non-profit organizations or state or local government agencies, such as rental assistance payments from the New Castle County Family HOPE Project.

The first line of the section needs a “for” between “excluded” and “food benefits” so it reads “excluded for benefits” instead of “excluded food benefits.” Additionally, the phrasing of “Income excluded under TANF to only include” is extremely unclear – is it excluded or only included? Perhaps instead DHSS/DSS may wish to use similar language as used in the financial responsibility regulation: “DSS disregards the types of income listed in this policy when determining financial eligibility” for food benefits.

Recommendation: council may wish to support the goal of this rulemaking but recommend edits to the changes so that they communicate the intention of the changes:

- 1) ***The first line of the section needs a “for” between “excluded” and “food benefits” so it reads “excluded for benefits” instead of “excluded food benefits.”***
- 2) ***Additionally, the phrasing of “Income excluded under TANF to only include” is extremely unclear – is it excluded or only included? Perhaps instead DHSS/DSS may wish to use similar language as used in the financial responsibility regulation: “DSS disregards the types of income listed in this policy when determining financial eligibility” for food benefits.***

➤ **General notices: Lifespan Waiver**

Analysis will be forthcoming prior to the November 14th deadline.