



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES

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MEMORANDUM

DATE: December 21, 2012

TO: Ms. Sharon L. Summers, DSS
Policy, Program & Development Unit

FROM: Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities

RE: 16 DE Reg. 607 [DSS Proposed Food Supp. Program Identification Card Regulation]

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Health and Social Services/Division of Social Services' (DSS) proposal to amend its Food Supplement Program regulation. The proposed regulation was published as 16 DE Reg. 607 in the December 1, 2012 issue of the Register of Regulations. As background, the current regulation requires DSS to "issue a serially numbered photo-ID card to each certified Food Stamp household". With implementation of the Electronic Benefit Transfer (EBT) Card, DSS notes that it is no longer necessary for program participants to be issued a DSS identification card. Moreover, DSS observes that CMS has deleted the requirement from the federal regulations. Therefore, DSS proposes deletion of the requirement of issuance of the identification card.

The percentage of the population that is on food stamps is much higher than other assistance programs. In addition, the DSS issued identification card is the only form of identification for many people. Therefore, SCPD has reservations regarding the proposal to no longer issue such identification cards since there is a downside to this approach.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our position on the proposed regulation.

cc: Ms. Elaine Archangelo
Mr. Brian Hartman, Esq.
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council