



STATE OF DELAWARE  
**STATE COUNCIL FOR PERSONS WITH DISABILITIES**

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**MEMORANDUM**

DATE: June 25, 2014

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

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

RE: 17 DE Reg. 1140 [DSS Proposed Food Supplement Program Unearned Income Verification 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 regulations regarding the Food Supplement Program published as 17 DE Reg. 1140 in the June 1, 2014 issue of the Register of Regulations.

As background, 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 and the amount of benefits. DSS is opting to not use the IEVS system to obtain information on unearned income. Instead, "DSS will continue to use alternative methods to document and verify unearned income." Both earned and unearned income are considered when assessing eligibility. See 16 DE Admin Code 9054-9057.

The rationale for opting to use "alternative methods" to verify unearned income is not provided. The justification could be based on cost, accuracy of information, or difficulty in acquiring information.

SCPD is unable to offer comments (pro or con) given lack of information on the justification for using unearned income verification sources other than the federal IEVS.

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

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