

Division of Social Services
Delaware Health and Social Services
1901 N. DuPont Highway
PO Box 906
New Castle, DE 19720



Thank you for considering our comments regarding your proposed changes to the recertification of SNAP benefits. The Delaware Coalition Against Domestic Violence (DCADV) is writing to ask you to reconsider these changes. Research in 2019 [has demonstrated](#) that forcing applicants to recertify more frequently means that those who meet the criteria for this support and assistance do not access it. These cases often “churn”, meaning that the families will cycle on and off on the SNAP programme. Despite being eligible, the recertification will often mean that families have months where they are not accessing SNAP benefits. Allowing families to experience economic insecurity is directly opposed to DCADV’s work preventing domestic violence.

Families who experience domestic violence disproportionately rely on SNAP benefits - a survey of domestic violence advocates [showed that 88%](#) found that SNAP was a critical resource for families who had experienced domestic or sexual violence. This is particularly true for survivors with disabilities, LGBT survivors or those with limited English. Over 68% of survivors they worked with rely on SNAP benefits to survive. If it is more difficult for Delawareans to access SNAP, this churn will likely disproportionately affect domestic violence survivors.

In addition to harming the survivors who already rely on these benefits for survival, reducing access will foster an environment for future abuse to occur. Economic instability is a [primary risk factor](#) for domestic violence. As more families lose access to these benefits, the subsequent economic insecurity limits individual’s ability to leave unsafe relationships. This change to SNAP benefits hinders individuals from achieving the financial independence necessary to prevent violence.

SNAP is a federally funded programme, not directly funded by the state of Delaware. Various federal agencies, [such as the USDA](#), have recognised the effect that churn has on the most vulnerable populations. Delaware is [currently striving](#) to reduce the effects of trauma and to incorporate trauma prevention and intervention in all government action within Delaware. By decreasing the time required for recertification, DHSS/DSS is not supporting domestic violence survivors. We urge you to reconsider this proposal.

Sincerely,

A handwritten signature in black ink that reads "Nick M".

Nick Beard
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