

January 26, 2015

Sharon Summers
Planning & Policy Development Unit
Division of Medicaid & Medical Assistance
1901 N. DuPont Hwy.
P.O. Box 906
New Castle, DE 19720-0906

RE: DMMA Proposed Medicaid Inpatient Rehabilitation Hospital Regulation [18 DE Reg. 509 (01/01/15)]

Dear Ms. Summers:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Medicaid and Medical Assistance (DMMA) proposal to amend the Medicaid State Plan in the context of Freestanding Inpatient Hospital Services. The proposed standards would apply to patients discharged on or after December 1, 2014. DMMA is adopting the Medicare payment standards and rates. The Medicare system classifies patients into distinct groups based on their clinical characteristics and what each patient's expected resource needs will be. At p. 512. The Division notes that "Medicare rates are updated annually to reflect changes in local wages using the hospital wage index." At pp. 511 and 512.

The GACEC **endorses** the proposed standards. We would like to note however that covered facilities may benefit from using a similar reimbursement system for both Medicaid and Medicare patients.

If you have any questions on our comments, please contact me or Wendy Strauss at the GACEC office.

Sincerely,

Robert D. Overmiller
Chairperson

RDO:kpc