

May 28, 2014

Deborah Harvey
Division of Public Health
417 Federal Street
Dover, DE 19901

RE: DPH Proposed Skilled Home Health Agency Director Qualifications Regulation [17 DE Reg. 1037 (May 1, 2014)]

Dear Ms. Harvey:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Public Health (DPH) proposal to amend one standard within the regulations covering skilled home health agencies. Council **endorses** the proposed amendment since the current standard is rather limited. The current regulation requires a director of a skilled home health agency to "have a Baccalaureate Degree in health or a related field". The proposed qualifications will require more robust credentials. A director would be required to meet the following standards:

- (1) Have a Baccalaureate Degree with five years healthcare experience and at least one year supervisory experience (full-time or equivalent in home health care); or
- (2) Be a registered nurse with five years health care experience and at least one year of supervisory experience (full-time or equivalent) in home health care.

Council would suggest that the Division clarify whether existing directors will be "grandfathered" or if the regulation will be applied to disqualify existing directors who do not meet the new standards.

Thank you for your time and consideration of our recommendations. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Terri A. Hancharick
Chairperson

TAH:kpc

CC: Dr. Karyl Rattay