

December 30, 2014

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 Primary Care Payment Rate Regulation [18 DE Reg. 424 (12/01/14)]**

Dear Ms. Summers:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Medicaid and Medical Assistance proposal to adopt a State Medicaid Plan amendment in reference to methods and standards for establishing payment rates for primary care services and physician-administered vaccines. The GACEC **endorses** the proposal subject to one concern. The Plan Amendment recites that vaccine administration "shall be paid at the lesser of the state regional maximum administration fee set by the Vaccines for Children (VFC) program." At p. 428. This wording is somewhat unusual. It is common to recite that a standard will be the lesser of "A" or "B". It is peculiar to recite that a standard will be the lesser of "A". DMMA may wish to clarify the standard.

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