

June 25, 2018

Nicole M. Cunningham  
Planning, Policy & Quality Unit  
Division of Medicaid & Medical Assistance  
1901 N. DuPont Hwy.  
P.O. Box 906  
New Castle, DE 19720-0906

**RE: DMMA Proposed Home Health Services Accreditation Expansion Regulation [21 DE Reg. 951 (June 1, 2018)]**

Dear Ms. Cunningham:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Health and Social Services (DHHS)/Division of Medicaid and Medicare Assistance (DMMA) proposal to amend Home Health Services, specifically, to add accreditation as an option to Medicare certification for Medicaid providers. Council **endorses** the proposed change as it may improve the supply of home health agencies (HHAs). However, we would ask that DMMA be careful to not sacrifice quality control in order to acquire an adequate supply of HHAs and remain vigilant in their oversight of HHAs, regardless of the source of their accreditation.

Currently, Home Health Agencies (HHAs) must be Medicare-accredited in order to participate in the Medicaid program. This proposal will expand eligibility for participation in Medicaid to HHAs who are accredited by other means by adding "...or by an accreditation organization..." According to background information provided in the preamble language of the regulation, DHSS/DMMA has worked closely with the provider community to develop an alternative which provides flexibility and removes limitations. If handled with careful oversight, this change appears to be beneficial to the State.

Thank you for your consideration of our endorsement. Please contact me or Wendy Strauss at the GACEC office if you have any questions.

Sincerely,

Terri A. Hancharick  
Vice Chairperson

TAH:kpc