



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904
302-739-4553 (voice) 302-739-6126 (fax) <http://www.gacec.delaware.gov>

January 27, 2020

Nicole Cunningham
Planning, Policy and Quality Unit
Division of Medicaid and Medical Assistance
1901 North DuPont Highway/P O Box 906
New Castle, DE 19720-0906

RE: 23 DE Reg. 519 [DHSS/DMMA Proposed Non-Emergency Medical Transportation (NEMT) Regulation (January 1, 2020)]

Dear Ms. Cunningham:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Health and Social Services (DHSS)/Division of Medicaid and Medical Assistance (DMMA) proposed amendment of Title XIX Medicaid State Plan regarding non-emergency medical transportation services (NEMT), specifically to establish coverage and reimbursement methodologies. Council **supports** the proposed amendment; however, we would like to share the following observations.

The regulation needs to be clear about when prior authorization may be needed. It also needs to be made clearer that lodging/meal providers must be enrolled as Medicaid providers. Section 3.1.ii only lists the Ronald McDonald Houses.

Council notes that the fee schedule referenced in the public notice could not be accessed via the link provided and could not be found by searching the fee schedule section of the website.

Thank you for your time and consideration of the comments provided by the DLP. Please feel free to contact me or Wendy Strauss should you have any questions.

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc