



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 28, 2022

Regulatory Specialist
Delaware Department of Insurance
1351 West North Street, Suite 101
Dover, DE 19904

Re: Department of Insurance Proposed Requirements for Mandatory Minimum Payment Innovations in Health Insurance Reg. [25 DE Reg. 684 (January 1, 2022)]

To whom it may concern:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Department of Insurance proposal to implement Senate Substitute 1 for Senate Bill 120 through proposed regulation 1322 Requirements for Mandatory Minimum Payment Innovations in Health Insurance. Council **supports** the regulation as written.

The purpose of the regulation "is to establish a process through which carriers must demonstrate compliance with requirements for mandatory minimum payment innovations, including alternative payment models, provider price increases, carrier investment in primary care, and other activities deemed necessary to support a robust system of primary care by January 1, 2026" (2.0).

The instrument to establish mandatory minimums for payment innovations and alternative payment models is the Office of Value-Based Health Care Delivery (OVBHCD). SS1 for SB 120 is a law that aims to strengthen the delivery of primary healthcare services in Delaware. The regulation incrementally increases spending yearly for primary care services; reigns in price increases for non-professional services; and requires the adoption of an alternative payment model.

The law and regulation are admirable attempts to improve the health of all Delawareans. The emphasis is to use primary care providers and primary care services to engage patients, build upon the relationship between a primary care physician (PCP) and his or her patient, and provide quality care to

find and treat illnesses or medical problems in the early stages rather than when the problems become severe and require hospitalization and have poorer outcomes.

Thank you for your consideration. Please contact Pam Weir or me at the GACEC office if you have any questions.

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc