

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

May 31, 2022

Kimberly Xavier 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: <u>25 DE Reg. 1033 [DHSS/DMMA Public Notice of Proposed Amendments to the HCBS Lifespan Waiver Regulation (October 1, 2021)]</u>

Dear Ms. Xavier:

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) public notice announcing proposed changes to the 1915(c) Lifespan Waiver. This waiver funds services provided through the Division of Developmental Disabilities Services (DDDS). Council <u>supports</u> the proposed changes as they would likely increase overall payment rates for providers for many of the services provided through the waiver and help with recruitment and retention of direct service providers (DSPs). This increase in pay will ultimately benefit service recipients.

As the disability community has been painfully aware in recent years, DSP shortages and the difficulties that many provider agencies encounter in recruiting and retaining staff with sufficient training and experience inevitably affects the availability and quality of services for people with disabilities. The GACEC encourages efforts to bolster staffing for services offered through the waiver. The changes proposed in the waiver amendment would also make needed services and assistive technology more accessible to DDDS service recipients who are deaf or hard of hearing or who otherwise primarily communicate in American Sign Language (ASL).

Council would like to offer one suggestion. It would be helpful to analyze data following one year of implementation to determine the extent to which the waiver modifications are positively impacting access to services of sufficient quality and intensity.

Thank you for your time and consideration of our support. Please feel free to contact Pam Weir or me should you have any questions.

Sincerely,

Ann C Físher

Ann C. Fisher Chairperson

ACF: kpc