



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904  
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September 30, 2022

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

**RE: 26 DE Reg. 155 [DHSS/DMMA Proposed Medicaid Recovery Audit Contractors Program Regulation (September 1, 2022)]**

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) proposal to amend its State Plan in reference to the Medicaid Recovery Audit Contractors (RAC) program. DMMA is requesting an exception to the RAC contracting requirements. Council **supports** the proposed regulations; however, we would like to share one request for additional information.

Council understands that these programs are one of several strategies to improve "program integrity" within the Medicaid system. They are used in order to detect and investigate over and underpayments, along with fraud and abuse in the Medicaid provider systems. Apparently, a number of states have had to seek waivers of this requirement. We would like to ask what other methods DMMA plans to use to enhance program integrity.

Thank you for your time and consideration of our support. As noted earlier, we would like to learn more about strategies being used to improve program integrity within the Medicaid system and look forward to hearing from DMMA. Please feel free to contact Pam Weir or me should you have any questions on our comments or request.

Sincerely,

*Ann C Fisher*

Ann C. Fisher  
Chairperson

ACF: kpc