



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

Melissa Doehring
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. 374 [DHSS/DMMA Proposed Reasonable Income Compatibility Regulation (November 1, 2022)]

Dear Ms. Doehring:

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 the Delaware Social Services Manual (DSSM) 14800 regarding the Reasonable Income Compatibility Threshold. Council **endorses** the proposed amendment since it will assist individuals with the recertification process. It will also ease the administrative burden on DMMA as it processes all of the recertifications that must take place when the public health emergency (PHE) ends.

Council understands that the DMMA proposal will increase the variance standard from 10% to 25%. This change will aid in the passive renewal process of Medicaid members during the PHE and the unwinding period of the PHE. This change will also decrease the need for manual intervention, decrease the risk for inappropriate terminations, and allow staff the ability to focus on the large caseload of renewals that are unable to be passively renewed.

DMMA is concerned that when the PHE finally ends, individuals may find it difficult to document income and that people may be terminated who are eligible. The proposed amendment will assist in this area.

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

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc