



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904  
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September 30, 2025

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

**RE: 29 DE Reg. 186 DHSS/DMMA Proposed Title XIX Medicaid State Plan Buy in Amendment Regulations (September 1, 2025)**

To Whom It May Concern:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Health and Social Services/Division of Medicaid and Medical Assistance (DHSS/DMMA) proposal to amend Title XIX Medicaid State Plan regarding Buy-In. The proposed amendment would specifically, "... provide clarity that DMMA accretes clients to the Buy-In for Part A, as needed, and Part B for all Medicaid programs where a client is dually eligible for Medicare and Medicaid." The GACEC would like to share the following observations and question.

This proposed amendment was developed in concert with the Centers for Medicare and Medicaid Services (CMS). In it, DMMA indicates that they have a buy-in agreement with CMS in which DMMA agrees to cover Medicare premiums for Medicare-eligible individuals enrolled in certain programs. Council would like to share a concern for the payment of Part A premiums for individuals in the Qualified Disabled and Working Individuals (QDWI) program. DMMA will pay Part A premiums under a group payer arrangement, subject to a contribution. Because this is a "group payer" selection, even if a person is already enrolled in Part B, they will still need to conditionally enroll in Part A at the Social Security Administration (SSA) office. Also, there are limitations in a group payer state on when an individual must submit their Conditional Part A application to SSA; those who miss the three-month window must wait until the next year. "The group payer process requires the lowest income older adults to take an additional application step that is not necessary in the [buy-in States]." This extra step may be an unnecessary hurdle to this population.

Council would like to ask why DMMA chose to use the group payer method for payment of premiums for individuals enrolled in the QDWI program. Council would also encourage DMMA to consider the direct buy in method since it would be less of a burden and less difficult for persons with disabilities.

Thank you for your time and consideration of our observation. We look forward to receiving information on our inquiry. Please feel free to contact Pam Weir or me should you have any questions on our comments or requests for clarity on our inquiry.

Sincerely,

*William H. Doolittle*

William H. Doolittle  
Chairperson

WHD: kpc