MEMORANDUM

DATE:       June 28, 2018

TO:         Ms. Nicole Cunningham, DMMA
            Planning & Policy Development Unit

FROM:       Nicholas J. Finta, Ed.D - Chairperson
            State Council for Persons with Disabilities

RE:         21 DE Reg. 951 [DMMA Proposed State Plan Amendment related to Accreditation
            of Home Health Agencies Regulation (June, 2018)]

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Health
and Social Services/Division of Medicaid and Medical Assistance’s (DMMAs) proposed
regulation to expand eligibility for participation in Medicaid to HHAs who are accredited by
other means. The proposed regulation was published as 21 DE Reg. 951 in the June 1, 2018
issue of the Register of Regulations. The SCPD has the following observations.

The proposed change references the National Association for Home Care and Hospice for a list
of accrediting agencies (attached). HHA will still be required to be licensed by the State. The
preamble language in the regulation suggests the requiring Medicare accreditation is a barrier for
some HHAs. As such, DMMA has worked with the provider community to provide alternatives.

The SCPD is endorsing the proposed change as it may improve the supply of HHAs, with the
caveat that DMMA should be careful not to sacrifice quality control in order to acquire an
adequate supply of HHAs, and that State agencies need to remain vigilant in their oversight of
HHAs, regardless of their source of accreditation.

Thank you for your consideration and please contact SCPD if you have any questions regarding our
position on the proposed regulation.
cc: Mr. Stephen Groff
Ms. Laura Waterland, Esq.
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council

21reg951 dmma-amendment re accreditation of HHAs 6-28-18
National Association for Home Care & Hospice

Accrediting Agencies

Accreditation Commission for Health Care, Inc.
Phone: (855) 937-2242
Web: www.achc.org

Community Health Accreditation Program
Phone: (212) 363-6555 or (800) 666-1656, ext. 242
Web: www.chapinc.org

Joint Commission on Accreditation of Healthcare Organizations
Phone: (830) 792-5500
Web: www.jointcommission.org

Testimonials

The greatest joy one can have is doing something for another without any thought of getting something in return.

- John Wooden
1910 - 2010