



September 10, 2020

Wayne A. Smith
President & CEO

The Honorable Bethany Hall-Long
Lieutenant Governor
150 Martin Luther King Jr. Blvd. South
3rd Floor
Dover, DE 19901

The Honorable Jeffrey W. Bullock
Secretary of State
401 Federal Street
Dover, DE 19901

*Alfred I. duPont Hospital
for Children*

Mark Mumford,
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Terry Murphy,
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Vincent Kane,
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Association*

Wayne A. Smith,
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RE: Comments on the PRAC Interim Report

Lt. Governor Hall-Long and Secretary Bullock,

The Delaware Healthcare Association (DHA), representing hospitals and health care delivery systems in Delaware, appreciates the opportunity to comment on the Pandemic Resurgence Advisory Committee's (PRAC) Interim Report. As Co-Chairs of the PRAC, we commend you and the Committee's work in developing such a comprehensive and thoughtful roadmap for addressing a possible resurgence of COVID-19. We also respectfully submit the following feedback and recommendations on the Interim Report, which we hope will add to the effectiveness of the PRAC's final report.

1. **Include a statement on transparency and reporting of dollar spend with specific reference to the appropriate funding streams** when speaking about financing and funding sources. For example, include whether the funds are state general funds, rainy day funds, federal funds, etc.
2. **Include a method of accountability.** For example, include a commitment from the State to publicly report weekly on progress under each activity/strategy/action step. That would focus energy on progress on all of these recommendations.
3. **Prioritize recommendations, set timelines, and assign ownership of recommendations** so that the State may focus on action steps that are most urgent and important.
4. **Add plans for support activities** necessary to keep the vital health workforce (and other essential workers) working. For example, clear, pre-planned childcare must be available and suited to the needs of our workforce.
5. **Include strong support for making expanded telehealth provisions permanent** in the subcommittee report. Strong support for continuing telehealth parity payment, which is consistent with the Committee's "incentivize providers for providing non-facility care." Recognition that telehealth is an important component of a value-based care approach needs to be maintained.

6. The report should include a **plan to increase the number of tests and reduce median turnaround time**. Although the report recommends increasing testing in difficult to reach communities, it does not spell out an action plan for getting there. This plan needs to be in place now, before (or to prevent) resurgence, and there is no question that there needs to be widespread, easily accessible testing in the event of a resurgence. The plan should also update and clarify existing information and guidance on what types of tests are being used and where.
7. **Do not conflate COVID-19 relief with the movement toward value**. The PRAC should rework the following statement that says: “Support the healthcare sector while advancing Delaware’s healthcare goals (e.g., alternative reimbursement models) by allocating a portion of Coronavirus Relief Fund to healthcare providers based, in part, on their commitment in advancing those goals.” Health care providers are committed to value-based care and implementing alternative delivery models and want to continue working with key stakeholders to continue those efforts. However, providers are also dealing with an unprecedented financial crisis. Therefore, CARES Act funds should be directed towards their intended purpose of COVID-related issues, not to bolster other state health care goals, however worthwhile. There should also be a transparent process by which CARES Act funds are allocated to providers, in accordance with federal guidelines.
8. **Support the purchasing of PPE for the state stockpile and refining guidelines for disbursement**. The strong recommendation that hospitals maintain a 90-day supply of PPE needs to account for possible supply line problems and the need to make use of the stake stockpile in our facilities.
9. **The State needs to continue to provide behavioral/mental health and social service supports at testing sites**. State providers should be available at sites and there should be a specific question at registration regarding any behavioral health/social service concerns.
10. **Ensure behavioral health/social service supports are easily accessible**. Ensure that the community DSAMH calendar has a COVID-specific color code/designation so people can find support, and the DSAMH Hopeline should be highlighted, including the specific track for health care workers. The state should ensure that social service supports and connections to social service platforms are readily available for those in need.
11. **All COVID-related patient communications need to be in culturally appropriate language**, and written communications need to be at the sixth grade or lower level, translated into Spanish, Haitian Creole, and Mandarin, in addition to English. If videos or public announcements are made, captioning should be used to provide access for the deaf community.
12. **Synchronize school reopening plans with PRAC recommendations**. In the event of a major resurgence, school planning and coordination is very much intertwined in the work of the PRAC’s three subcommittees and should be reflected in the report.

13. **Continue PRAC meetings throughout the fall** to actively monitor and respond to the COVID-19 situation in Delaware.
14. **Emphasizing importance of early flu vaccination and flu campaign.** It is crucial that the state and health systems coordinate on a statewide flu vaccine campaign and stress the importance of early vaccination.
15. **Addressing provider surge capacity.** In the event of a major resurgence of COVID-19, the state must better coordinate and align efforts with health systems around provider surge capacity and crisis standards of care. A work group may be needed to organize and finalize a surge plan.
16. **Continue diversity efforts.** COVID-19 has further demonstrated the health disparities that exist for minorities and those in low income communities. State health boards, commissions and health care providers should be more reflective of the communities they serve to ensure an emphasis on planning and supports for underserved communities.

We thank you for your leadership in developing the PRAC Interim Report and we appreciate the opportunity to provide feedback that we hope will only strengthen Delaware's response to a resurgence of COVID-19 or any future pandemic.

Sincerely,



Wayne A. Smith
President & CEO
Delaware Healthcare Association