



September 29, 2020

Wayne A. Smith
President & CEO

Molly Magarik
Secretary
Delaware Health and Social Services
1901 N. Du Pont Highway, Main Building
New Castle, Delaware 19720

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for Children

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RE: DHSS Strategic Plan Comments

Dear Secretary Magarik,

On behalf of Delaware's hospitals and health care delivery systems, thank you for the opportunity to comment on the Delaware Health and Social Services (DHSS) [strategic plan](#), *Achieving the Vision: Person-Centered Health and Human Services in Delaware*. We appreciate that DHSS has long been a committed partner in our goal to make every Delawareans as healthy as they can be. We look forward to continuing to work together on several important initiatives, and recommend the following be considered in achieving the goals described in the strategic plan:

- 1. Incorporate COVID-19 experience into plan** - The strategic plan was written before the COVID-19 pandemic. The pandemic experience has provided numerous lessons learned and areas for potential improvement. It is important now to incorporate more pandemic response items into the plan, specifically indicating where responsibilities will lie for various elements of pandemic planning and response.
- 2. Alignment with Pandemic Resurgence Advisory Committee (PRAC)** - Over the last few months, the PRAC worked to create a roadmap for the state and its partners to prepare for and tackle major issues associated with COVID-19. With COVID being present in all aspects of our healthcare system for the foreseeable future, we believe the strategic plan should align with the recommendations in the final report of the PRAC wherever possible.
- 3. Prioritize solutions to the patient abandonment/guardianship issue** – Too many Delawareans go through the experience of being stuck in the hospital long after their period of acuity has passed with no means to transition home or to a more appropriate care setting. This can occur when a patient is unable to make decisions regarding their transition from the hospital to a more appropriate care setting, lack a decision maker to make the transition, or in some cases have a relative who refuses to exercise decision-making on their behalf. Addressing this issue would be an exemplary

achievement of DHSS's goal of developing a person-centered approach to meeting the needs of individuals and families.

4. **Make public DHSS policy memorandums** - In recent years, there have been several occasions where our organizations have collaborated on issues where DHSS staff make reference to internal "policy memos" that govern many of the decisions and practices of the Department. Yet, it is difficult for an organization to properly work toward advancing the health of Delawareans alongside the Department without having visibility into what parameters guide decision making, prioritization and action within DHSS. For this reason, DHA requests that DHSS policy memos be available to the public on the DHSS website landing page as well as on the relevant division webpages to further ensure ongoing partnerships are as productive and effective as possible. This request is consistent with the goal to promote communication between DHSS and stakeholders.
5. **Support the health care workforce we need** – A strong primary care system allows for more healthy individuals while also ensuring emergency departments are used for true emergencies. Similarly, hospital stays are less frequent through better avoidance and management of chronic conditions. Unfortunately, there is a primary care shortage across the nation, and we are feeling the strain here in Delaware. DHA urges DHSS to support initiatives that promote a robust health care workforce, including continuing to support the legislative initiative (House Bill 257 in the 150th General Assembly) to create a new state medical loan repayment program for primary care providers, with adequate funding.
6. **Address workforce reimbursement challenges** - Although the plan is creative in terms of considering how non-traditional qualifications could bolster the workforce pool, the reimbursement issue still needs attention, particularly for contracted direct support professionals. Training is not sufficient for workforce development and findings from the recent rate study could be integrated into the plan.
7. **Focus on Behavioral Health**- COVID-19 has greatly exacerbated long-standing issues for Delawareans struggling with addiction and mental illness and worsened behavioral health issues in general. We recommend that the strategic plan emphasize the need for better behavioral health supports and planning through the Division of Substance Abuse and Mental Health and its providers.
8. **Incorporate services for children in the plan** - The plan is focused largely on adult services, but children are an important constituency. DHA recommends adding more pediatric indicators and focusing on especially underserved pediatric populations, including children transitioning to adulthood. Additionally, we recommend increased synchronization with the Delaware's Department of Services for Children, Youth, and their Families (DSCYF), especially for children transitioning to adulthood.
9. **Implicit bias** should be considered in the planning around cultural competence.

10. **Consider taking advantage of currently available tools to improve person-centered care** - Data integration to improve person-centered care and coordination of benefits should include consideration of currently available tools to streamline benefits and expedite eligibility. Medicaid, for instance, could use the federally-allowable option to offer families 12 months of continuous eligibility for children instead of requiring proof of income, etc., at shorter intervals, and every time there is a change in circumstances. Other similar options should be considered. These would ease burdens on both families and providers and possibly reduce the need for staff to help families navigate benefits. However, we do agree that patient navigators are important for other populations that cannot take advantage of expedited methods of eligibility.

11. **Telehealth and reimbursement parity** - It is important for DHSS to support telehealth and reimbursement parity, as these services continue to be critical in terms of access during COVID.

Again, thank you for seeking feedback on the DHSS strategic plan. We look forward to continuing to work together on these and other important initiatives to make all Delawareans as healthy as they can be.

Sincerely,



Wayne A. Smith
President & CEO
Delaware Healthcare Association