

Social & Human Service Programs Review

State of Rhode Island
Office of the Health Insurance Commissioner
Advisory Council Meeting

March 23, 2023

Introductions

Onsite Team

- **Barbara Culley** – Project Lead, focus on project facilitation and programmatic tasks
- **Ian McCulla** – Finance Lead, focus primarily on the actuarial tasks
- **John Kasey** – Finance Lead, focus on rate benchmarking
- **Natalie Angel** – Programmatic Lead, focus primarily on programmatic tasks

Faulkner Consulting Group

- **Deb Faulkner** – Senior Advisor
- **Grant Porter** – Senior Data Consultant
- Other FCG staff as needed



Programmatic Workstream Discussion

Programmatic Led Workstream

Inclusive of the following tasks



Task 3: Eligibility standards and processes of social and human service programs



Task 4: Structure of state government as it relates to the provision of services by social and human service providers including eligibility and functions of the provider network



Task 5: Accountability standards for services for all social and human service programs



Task 6: Professional licensed and unlicensed personnel requirements for established rates for social and human service programs



Task 7: Access to social and human service programs, to include waitlists and length of time on waitlists in each service

The finance and programmatic workstreams are fully integrated. Each task is developed and reviewed by both groups and findings on one task inform all others.

Programmatic Led Areas of Review

Eligibility

- Eligibility Standards
- Processes for Eligibility Determination and Redetermination

Government Structure

- How Program Oversight is Distributed within Departments
- Oversight of Providers
- Provider Credentialing

Accountability Standards

- Federal Oversight and Reporting
- State Regulations, Reporting and Advisory Councils
- Internal Audits

Professional licensed and unlicensed personnel requirements

- Workforce Challenges
- Top of License

Access

- Formal Waitlists
- Provider Capacity Issues



Finance Workstream Discussion

Finance Led Workstream Status Update

| | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep |
|--|---------|---------|---------|-----|-----|-----|-----|-----|
| Finance Workstream | | | | | | | | |
| Key informant interviews | | | | | | | | |
| Task 1: Assessment / reporting: social and human service program rates | Phase 1 | Phase 2 | | | | | | |
| Task 2: Assessment / reporting: utilization trends 1/1/17 - 12/31/21 | Phase 1 | | Phase 2 | | | | | |
| Task 8: Assessment / reporting: national and regional Medicaid rates in comparison to Rhode Island social and human service provider rates | Phase 1 | | Phase 2 | | | | | |
| Task 9: Assessment / reporting: usual and customary rates paid by private insurers and private pay for similar social and human service providers | Phase 1 | | Phase 2 | | | | | |

STATUS

- Phase 1 of Task 1 is targeted to be released March 31, 2023
 - Stakeholder feedback will be incorporated in Phase 2
- Phase 1 of Task 2 will cover Medicaid services
- Phase 1 of Task 8 and Task 9 will cover select Medicaid services
- Phase 2 will broaden scope of services reviewed in Phase 1
- Key informant interviews will be continued on an as-needed basis

Timelines are contingent upon timely service prioritization and receipt of data requests

Fee Schedule Benchmarking

Requirements for consistent comparison across payers

Service Delivery

- Service requirements
 - Provider/staff credentials
 - Staffing ratios
 - Evidence-based practices
- Delivery system
 - Provider administrative and oversight requirements
 - Services covered/not covered

Reimbursement Structure

- Billable units
 - Different billable unit type (visits/15 minutes)
 - Different maximum billable units
- Rates with tiered reimbursement based on:
 - Provider credentialing
 - Client acuity
 - Staff ratios
- Bundled services
- Alternative payment model

Fee Schedule Benchmarking Example #1

Differences in billed unit type

Massachusetts Early Intervention program defines the billable unit for an intake screening as 15 minutes.

| Procedure Code | Service Description | Unit | Rate Per Unit |
|----------------|--|------------|---------------|
| T1023 | Intake/Screening - an initial face-to-face meeting of a member and a member's caregiver with professional program staff to initiate the process of evaluation of eligibility and enrollment in the early intervention program | 15 Minutes | \$29.49 |

Rhode Island Early Intervention program defines the billable unit for an intake screening as per visit.

| Procedure Code | Service Description | Unit | Rate Per Unit |
|----------------|--|------------------------|---------------|
| T1023 | Intake - screening to determine the appropriateness of consideration of an individual for participant in a specified program, project or treatment protocol | Visit (max 90 minutes) | \$157.32 |

Normalizing unit types of comparable procedure codes across programs may be required in fee schedule benchmarking

Sources

Massachusetts Program Manual: <https://www.mass.gov/doc/early-intervention-services-regulations/download>

Massachusetts Rates: <https://www.mass.gov/doc/rates-for-early-intervention-program-services-effective-january-1-2022-and-july-1-2022-0/download>

Rhode Island Program Manual/Rates: https://eohhs.ri.gov/sites/g/files/xkqbur226/files/Portals/0/Uploads/Documents/Early-Intervention/ei_manual_072019.pdf

Fee Schedule Benchmarking Example #2

Covered services

Massachusetts Early Intervention program utilizes procedure codes 96164 and H2015 for health behavior intervention and comprehensive community support services.

Rhode Island does not utilize the **96164** or **H2015** procedure codes in any of their program fee schedules.

| Procedure Code | Service Description | Unit | Rate Per Unit |
|----------------|--|------------|---------------|
| 96164 | Health Behavior Intervention Group | 30 Minutes | \$14.74 |
| H2015 | Comprehensive community support services | 15 Minutes | \$25.28 |

These services may not be covered by Rhode Island's early intervention program. Contact with a program manager may be required to identify whether similar services are covered in other programs.

Certain services may not be equally covered across payers, or use of varying procedure codes may require additional research to identify comparable services.

Sources

Massachusetts Program Manual: <https://www.mass.gov/doc/early-intervention-program-eip-subchapter-6/download>

Massachusetts Rates: <https://www.mass.gov/doc/rates-for-early-intervention-program-services-effective-january-1-2022-and-july-1-2022-0/download>

Rhode Island Program Manual/Rates: https://eohhs.ri.gov/sites/g/files/xkqbur226/files/Portals/0/Uploads/Documents/Early-Intervention/ei_manual_072019.pdf

Fee Schedule Benchmarking Example #3

Rates with tiered reimbursement

Massachusetts Early Intervention program has only one rate for assessments regardless of the practitioner type.

| Procedure Code | Service Description | Unit | Rate Per Unit |
|----------------|---------------------|------------|---------------|
| T1024 | Assessment | 15 Minutes | \$36.21 |

Rhode Island Early Intervention program varies payment based on the practitioner type.

| Procedure Code | Practitioner | Service Description | Unit | Rate Per Unit | Practitioner Level |
|----------------|---|---------------------|------------|---------------|--------------------|
| T1024 | Certified Educator | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024TD | Registered Nurse | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024AE | Nutritionist | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024HP | Psychologist | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024TG | Master's Degree in Psychology or Counseling | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024AJ | Clinical Social Worker | Assessment | 15 Minutes | \$29.96 | 2 |
| T102TGHO | Educator for the Deaf | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024GO | Occupational Therapist | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024GP | Physical Therapist | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024GN | Speech-Language Pathologist | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024TLHO | Educator for the blind | Assessment | 15 Minutes | \$29.96 | 2 |
| T1024HN | Bachelor's Degree | Assessment | 15 Minutes | \$20.48 | 1 |

Fee schedule benchmarking should consider the credentials of the providers delivering the service.

Sources

Massachusetts Rates: <https://www.mass.gov/doc/rates-for-early-intervention-program-services-effective-january-1-2022-and-july-1-2022-0/download>

Rhode Island Program Manual/Rates: https://eohhs.ri.gov/sites/g/files/xkgbur226/files/Portals/0/Uploads/Documents/Early-Intervention/ei_manual_072019.pdf



Questions and Discussion

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