



## Social and Human Service Programs Review: Phased Approach Application Across Tasks

During the March 1, 2023 meeting of the Social and Human Service Programs Review Advisory Council, the Office of the Health Insurance Commissioner (OHIC) introduced a “phased approach” to the social and human service programs review. The phased approach divides each of the nine tasks, required under [State of Rhode Island General Laws \(RIGL\) § 42-14.5-3\(t\)](#), into two phases. Each of the nine tasks will have a report for each phase. Phase One will be completed during the 2023 legislative session, while Phase Two will be completed by the end of August 2023.

The phased approach aligns with [Bulletin 2022-3](#), which was issued by OHIC on September 7, 2022. Bulletin 2022-3 contemplated that OHIC would need to make prioritization decisions, informed by a range of factors, regarding which rates would be analyzed during particular timeframes. The Bulletin further states that any such prioritization decisions should not be construed to mean that rates prioritized for analysis at a later time are out-of-scope.

The purpose of this document is to further clarify the phased approach.

### **Task 1: An assessment and detailed reporting on social and human services program rates, including rates currently being paid and the date of the last increase.**

- **Phase One Report:** [The Phase One Report](#) was completed on March 31, 2023. The purpose of this report is to establish the services in-scope of the rate review required by RIGL § 42-14.5-3(t) and document the corresponding rate and date of last rate increase, laying the foundation for the remaining assessments and phases. This report attempts to include the entire universe of in-scope codes. However, OHIC anticipates needing to make adjustments and additions to the Phase Two Report.
- **Phase Two Report:** Continued conversation with stakeholders and review of statutory language will occur to determine any adjustments for Phase Two of this task. Information on certain services provided by state agencies is still being gathered and may be included in Phase Two. These services are noted in the Phase One Report.

### **Task 2: An assessment and detailed reporting on eligibility standards and processes of all mandatory and discretionary social and human service programs.**

- **Phase One Report:** This report is intended to educate readers by providing a description of eligibility standards and processes for eligibility determination and redetermination for social and human service programs. This report will apply to all in-scope Rhode Island human services,

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and may also provide information on eligibility standards and processes for programs that are out-of-scope for rate review.

- **Phase Two Report:** This report will provide a more in-depth assessment and evaluation of eligibility standards and processes for eligibility determination and redetermination for a sub-set of programs included in the Phase One Report (e.g., comparing Rhode Island's eligibility standards to another state's eligibility standards). Adjustments to the Phase One Report will be included in this report as necessary. Programs targeted for in-depth assessment include those noted by stakeholders to be of interest and those where outliers in processes were noted in Phase One research.

**Task 3: An assessment and detailed reporting on utilization trends from the period of January 1, 2017, through December 31, 2021, for social and human service programs.**

- **Phase One Report:** This report will include available utilization metrics for in-scope services on the Medicaid fee schedule (found in Appendix 1 of Phase One of the report addressing the first task).
- **Phase Two Report:** This report will include available utilization metrics for non-Medicaid services (found in Appendix 2 of Phase One of the report addressing the first task). Additional updates to the information included in the Phase One Report may also be included.

**Task 4: An assessment and detailed reporting on the structure of the state government as it relates to the provision of services by social and human service providers including eligibility and functions of the provider network.**

- **Phase One Report:** This report is intended to educate readers by describing how program oversight is distributed within departments and provide information on the relationship between the program and providers of services. This could include how providers enroll, are monitored, or paid by the program. This report will apply to all in-scope services.
- **Phase Two Report:** This report will provide a more in-depth assessment and evaluation of how program oversight is distributed within departments. Evaluation may include comparison of staffing ratios and organization structure to other state programs. Adjustments to the Phase One Report will be included in this report as necessary.

**Task 5: An assessment and detailed reporting on accountability standards for services for social and human service programs.**

- **Phase One Report:** This report is intended to educate readers by providing an inventory of known points of accountability for state programs. This is done by describing federal oversight and reporting, state regulations reporting and advisory councils, and internal audits. This report will apply to all in-scope services.
- **Phase Two Report:** This report will provide a more in-depth assessment and evaluation of a sub-set of programs and services. Evaluation will include topics like transparency of data and detail on how data and report findings are utilized by programs. Adjustments to the Phase One Report will be included in this report as necessary.

**Task 6: An assessment and detailed reporting, on all professional licensed and unlicensed personnel requirements for established rates for social and human service programs pursuant to a contract or established fee schedule.**

- **Phase One Report:** This report will include a detailed description of personnel requirements for a subset of Medicaid services included in the Phase One Report for Task 1.
- **Phase Two Report:** This report will include a detailed description of personnel requirements for an additional subset of services included in the report for Task 1.

**Task 7: An assessment and reporting on access to social and human service programs, to include any wait lists and length of time on wait lists, in each service category.**

- **Phase One Report:** This report is intended to educate readers by describing formal waitlists for services and present a preliminary list of services that have been identified as experiencing access issues. This report also provides the approach and methodology that will be used to create Phase Two report.
- **Phase Two Report:** This report will provide a more in-depth assessment of formal waitlists for services and findings from research conducted on access to identified target services. Adjustments to the Phase One Report will be included in this report as necessary.

**Task 8: An assessment and reporting of national and regional Medicaid rates in comparison to Rhode Island social and human service provider rates.**

- **Phase One Report:** This report will compare a limited subset of home care and substance abuse treatment fee-for-service Medicaid rates to normalized Medicaid benchmarks.
- **Phase Two Report:** This report will compare a limited subset of fee-for-service Medicaid rates in the remaining service categories to normalized Medicaid benchmarks.

**Task 9: An assessment and reporting on usual and customary rates paid by private insurers and private pay for similar social and human service providers, both nationally and regionally.**

- **Phase One Report:** This report will compare the Medicaid fee-for-service fee schedule to provider billed amounts, commercial negotiated rates, Rhode Island Medicaid MCO rates, and Medicare benchmarks, to the extent that such benchmarks are available.
- **Phase Two Report:** This report will provide any necessary updates to the Phase One Report.

**Task 10: Completion of the development of an assessment and review process that result in recommended rate adjustments.**

- Phase One Reports and Phase Two Reports for tasks 1-9 will culminate in a final report, which will include rate adjustment recommendations. This report will be completed by September 1, 2023.