

Social and human service programs review: Professional and personnel requirements

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Background

Milliman, Inc. (Milliman) has been retained by the State of Rhode Island Office of the Health Insurance Commissioner (OHIC) to conduct a comprehensive review of all social and human service programs having a contract with or licensed by the state, inclusive of the State of Rhode Island Executive Office of Health and Human Services (EOHHS) and the state agencies under its purview. This review is required by State of Rhode Island General Laws (RIGL) § 42-14.5-3(t). This statute requires 10 assessments covering various rate and programmatic elements of the social and human service programs, with the 10th assessment being a culmination of the prior nine assessments that may be used to inform the recommended rate adjustments. Social and human service programs include services in the following subject areas: social, mental health, developmental disability, child welfare, juvenile justice, prevention services, habilitative, rehabilitative, substance use disorder treatment, residential care, adult/adolescent day services, vocational, employment and training, and aging.

The assessments will be completed in two phases, with Phase One published in May 2023, and Phase Two published by September 1, 2023. The first phase includes the first nine assessments with a limited scope of services. The second phase will include updates of the first nine assessments with additional services as well as the 10th report. Milliman is currently working with OHIC to determine the breadth of services that may be included in each assessment in Phase Two of the social and human service programs review.

This Phase One report addresses RIGL § 42-14.5-3(t) task 6: “an assessment and detailed reporting on professional licensed and unlicensed personnel requirements for established rates for social and human service programs pursuant to a contract or established fee schedule.” It provides insight into eight different service offerings and the credentialing and personnel requirements for each service. In addition to supporting future phases of benchmarking and rate development work, this report highlights the credentialing and licensure requirements which can have impacts to the cost of service, availability of providers, and quality of care provided for the services being reviewed.

Description of Services for Review

In this Phase One review, we examine eight services. Four of the services are related to substance use disorder (SUD) and the other four are related to home care services reimbursable by the state. This report establishes a common understanding of the variations in credentialed and non-credentialed providers which render social and human services in Rhode Island. In Phase Two, we will add additional services to the scope of this report and will leverage the findings of this report to build-out further detail on how services are delivered by social and human services providers. The details in this report will support the understanding of the services necessary to refine benchmarks to reflect the specific service delivery requirements of the Rhode Island social and human service programs.

SELECTION OF SERVICES FOR EVALUATION

As part of the comprehensive review of social and human service rates on behalf of OHIC, Milliman worked with OHIC to select certain services and tasks to occur as part of Phase One (for delivery in May 2023) and others for Phase Two (for delivery by September 2023). Our approach to prioritization was informed by quantitative and qualitative considerations. These considerations are described below.

Quantitative Considerations

- **Utilization.** We considered the utilization of services. In general, we prioritized services with higher utilization for review.
- **Date of Last Rate Update.** We evaluated the date at which service rates were last changed. In some cases, if a service has not had a rate change for a significant period of time, the service was prioritized accordingly.
- **Number Enrolled.** Where available, we identified the number of members receiving services as a proxy for social and human service program impact. Where enrollment is higher, the service was prioritized for programmatic evaluation.
- **Data Availability.** Some services have greater variation in rates and rate structures which adds complexity to the analysis. We considered the availability of data and complexity of the rate structure when prioritizing services.

Qualitative Considerations

- **Stakeholder Feedback.** We conducted multiple interviews, stakeholder meetings, and documentation review to gather an understanding of the priorities of the constituencies represented in this review.
- **Breadth of Sample.** We worked to evaluate a diverse set of services in Phase One and will continue to evaluate in Phase Two to ensure spread across the primary domains (Children’s Services, Behavioral Health, HCBS, I/DD).
- **Supportive Input to Phase Two.** Where possible, we gathered information, feedback, and performed programmatic research in Phase One that will directly inform the development of detailed quantitative analyses in Phase Two. The Phase One work is sequential to gather information necessary to support Phase Two analyses.

Taking all these considerations into account, we worked with OHIC to select services for evaluation within this Phase One assessment. Additional services will be selected based on the criteria above and included in the future, Phase Two report.

SUBSTANCE USE DISORDER TREATMENT SERVICES

The following four services have been identified for analysis based upon qualitative and quantitative considerations described in this report. The personnel requirements for these SUD services will be covered in the next section of the report.

- Substance abuse counseling and therapy (H0004).
- Alcohol and/or drug services; group counseling by a clinician (H0005).
- Alcohol and/or drug services; methadone administration and/or service (1 unit per week) (H0020).
- Alcohol and/or drug assessment, 60-90 minutes (H0001).

These codes may be reimbursed for care provided in varying settings depending on the service delivery requirements. These settings may include opioid treatment program health homes, outpatient treatment facilities, and other clinical settings.

HOME CARE (PERSONAL CARE AND NURSING)

The following home care services, two personal care services (attendant care and homemaker) and two nursing services (nursing assessment and private duty nursing), have been identified for analysis based upon qualitative and quantitative considerations described in this report. The personnel requirements for these home care services will also be covered in the next section of the report.

- Attendant care services; per 15 minutes (S5125).
- Homemaker service, not otherwise specified (nos); per 15 minutes (S5130).
- Nursing Assessment / Evaluation (T1001).
- Private duty / independent nursing service(s) - licensed, up to 15 minutes (T1000).

Personal care services may be funded through a variety of social and human service programs such as Rhode Island @Home Cost Share Program¹ or Medicaid fee-for-service, Personal Choice², or Independent Provider³ programs.

¹ @HOME Cost Share. (n.d.). Office of Healthy Aging. <https://oha.ri.gov/what-we-do/connect/home-care/home-cost-share>

² Personal Choice. (n.d.). Executive Office of Health and Human Services. https://eohhs.ri.gov/sites/g/files/xkgbur226/files/2022-02/eohhs-38747-nwd-flyers_personal-choice_85x11.pdf

³ Independent Provider Self-Directed Home Care Program. (n.d.). Executive Office of Health and Human Services. https://eohhs.ri.gov/sites/g/files/xkgbur226/files/2022-02/eohhs-38747-nwd-flyers_independent-provider-program_85x11.pdf

Summary of Personnel Requirements

The figure below summarizes the services, provider types, and reimbursement mechanisms for the selected eight Healthcare Common Procedure Coding System (HCPCS) codes spanning substance use disorders and home care.

HCPCS CODE	*CREDENTIALING REQUIREMENTS	PROFESSIONAL TYPES	CLINICAL OVERSIGHT REQUIREMENTS	UNITS OF REIMBURSEMENT
Substance Use Disorder Treatment Services				
H0004	ADC, PADC, CADC, CAADC, and CCS	Physician, licensed psychologist, registered nurse, social worker	None Identified	15-minute increments
H0005	ADC, PADC, CADC, CAADC, and CCS	Physician, licensed psychologist, registered nurse, social worker	None Identified	40-50 minute session
H0020	SAMHSA certified Opioid Treatment Program	Licensed methadone providers	Licensed practitioner supervision is sometimes required. Treatment plans are approved by a program clinical director.	One unit per week
H0001	PADC, CADC, CAADC, and CCS	Addiction counselor	None Identified	60-90 minute session
Home Care Services				
S5125	Home Health Aide, Certified Nursing Assistant, or homemaker	Home health aide, Certified Nursing Assistant	None Identified	15-minute increments
S5130	Home Health Aide, Certified Nursing Assistant, or homemaker	Home health aide, certified nursing assistant, or homemaker	None Identified	15-minute increments
T1001	RN	Registered nurse	None Identified	Per assessment
T1000	LPN and RN	Registered nurse, licensed practical nurse	Potential oversight by an agency or independent operation	15-minute increments

Notes

1. Credentialing requirements are based upon national standards.
2. Abbreviations used in the figure above are defined in the sections that follow.

More information for each service is described in the sections that follow.

Personnel Requirements Detail

This section provides a detailed review of the professional and personnel requirements for the selected services.

SUBSTANCE ABUSE COUNSELING AND THERAPY (H0004)

- **Services performed and requirements.** Substance use disorder counseling includes counseling, education, and support to patients. These services can also sometimes include case management and referrals.⁴
- **Provider credentialing requirements.** There are multiple credentials available for substance use counseling and therapy. In order to provide services related to mental health, providers must have credentials as a physician, licensed psychologist, registered nurse, social worker, marriage and family therapist, or counselor⁵. Some of these credentials include three types of Alcohol and Drug Counselors (ADC): Provisional (PADC), Certified (CADC), and Certified Advanced (CAADC). Additionally, Certified Clinical Supervisors (CCS) are also trained in providing SUD services to patients.⁶
- **Professional types currently providing the service.** An array of providers performs these services in Rhode Island. These providers include physicians, registered nurses, licensed psychologists, MSW social worker, marriage and family therapist, and counselors.⁷
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** These services are reimbursed fee-for-service per 15-minute increment.
- **Rate Observations.** In Rhode Island, rates for H0004 vary based upon the credentials of the provider. Rates are billed with modifiers to indicate the professional credentials of the provider. Providers with master's level credentials can use modifiers which result in higher reimbursement.

ALCOHOL AND/OR DRUG SERVICES; GROUP COUNSELING BY A CLINICIAN (H0005)

- **Services performed and requirements.** Group counseling for alcohol and drug services typically occurs in small group settings. Some of the components of this type of counseling include learning and practicing recovery strategies, building interpersonal skills, and reinforcing and developing social support networks.⁸
- **Provider credentialing requirements.** There are multiple credentials available for substance use counseling and therapy. In order to provide services related to mental health, providers must have credentials as a physician, licensed psychologist, registered nurse, social worker, marriage and family therapist, or counselor. Some of these credentials include three types of Alcohol and Drug Counselors (ADC): Provisional (PADC), Certified (CADC), and Certified Advanced (CAADC). Additionally, Certified Clinical Supervisors (CCS) are also trained in providing SUD services to patients.
- **Professional types currently providing the service.** An array of providers performs these services in Rhode Island. These providers include physicians, registered nurses, licensed psychologists, MSW social workers, marriage and family therapists, and counselors.
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** This is reimbursed fee-for-service for a typically 40-50 minute session.
- **Rate Observations.** For H0005, rates do not vary based upon the credentials of the provider delivering the service.

⁴ *What Does a Substance Abuse Counselor Do?* (n.d.). Verywell Mind. <https://www.verywellmind.com/what-does-a-substance-abuse-counselor-do-5442995>

⁵ *Clinician's Services.* (n.d.) Executive Office of Health and Human Services.

<https://eohhs.ri.gov/ProvidersPartners/ProviderManualsGuidelines/MedicaidProviderManual/RehabilitativeService/CliniciansServices.aspx>

⁶ *Rhode Island Substance Abuse Certification.* (n.d.). The Center for Addiction Studies and Research.

<https://centerforaddictionstudies.com/certification-requirements/us-substance-abuse-certification/rhode-island#:~:text=To%20receive%20a%20Rhode%20Island>

⁷ *Clinician's Services.* (n.d.). Executive Office of Health and Human Services.

<https://eohhs.ri.gov/ProvidersPartners/ProviderManualsGuidelines/MedicaidProviderManual/RehabilitativeService/CliniciansServices.aspx>

⁸ *Group Therapy in Substance Use Treatment.* (2021). Substance Abuse and Mental Health Services Administration.

https://store.samhsa.gov/sites/default/files/SAMHSA_Digital_Download/pep20-02-01-020.pdf

ALCOHOL AND/OR DRUG SERVICES; METHADONE ADMINISTRATION AND/OR SERVICE (1 UNIT PER WEEK) (H0020)

- **Services performed and requirements.** During this treatment, a provider will administer a prescription dose of methadone to patients as part of a certified treatment program.⁹ These services are commonly provided as part of Opioid Treatment Programs.
- **Provider credentialing requirements.** In order to administer methadone, providers must be part of the Substance Abuse and Mental Health Services Association (SAMHSA) certified Opioid Treatment Program, which includes being licensed in the State of Rhode Island, and being registered with the U.S. Drug Enforcement Administration (DEA).¹⁰
- **Professional types currently providing the service.** Physicians, pharmacists, registered nurses, licensed practical nurses, and other professionals may administer this service under program supervision of a physician.
- **Associated clinical administrative and supervision requirements.** Every methadone clinic is certified by SAMHSA and regulated by federal and state authorities. Additionally, physicians, pharmacists, registered nurses, licensed practical nurses, and other professionals may administer treatment if under the supervision of a licensed practitioner, who must be registered under the DEA-Narcotic Treatment Program and also registered under state and federal laws to administer and dispense opioid drugs.^{11,12,13} Treatment plans must be approved by a program clinical director.¹⁴
- **Reimbursement mechanism.** These services are reimbursed fee-for-service for one unit each week.
- **Rate Observations.** No variations were observed in rates for H0020 based upon the credentials of the administering provider.

ALCOHOL AND/OR DRUG ASSESSMENT, 60-90 MINUTES (H0001)

- **Services performed and requirements.** During this service, SUD providers conduct an evaluation of the presence and severity of substance use disorder to identify options for appropriate treatment.⁹
- **Provider credentialing requirements.** These services are typically provided by chemical dependency professional, which are providers that specialize in the rehabilitation of substance use disorders, such as physicians, psychologists, registered nurses, and licensed social workers.
- **Professional types currently providing the service.** This service is typically provided by a chemical dependency professional.¹⁵
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** This is reimbursed as fee-for-service for a 60-90 minute (typically 60 minutes) session.
- **Rate Observations.** No variations were observed in rates for H0001 based upon the credentials of the administering provider.

ATTENDANT CARE SERVICES; PER 15 MINUTES (S5125)

- **Services performed and requirements.** The services provided under this HCPCS code include personal care, standard dressing changes, medication assistance, and homemaking services.¹⁶

⁹ *What Is Methadone?* (2017, August 30). WebMD. <https://www.webmd.com/mental-health/addiction/what-is-methadone>

¹⁰ *Certification of Opioid Treatment Programs (OTPs)*. (n.d.). Substance Abuse and Mental Health Services Administration <https://www.samhsa.gov/medications-substance-use-disorders/become-accredited-opioid-treatment-program>

¹¹ *Doctors that Prescribe Methadone*. (2021, August 4). Eleanor Health. <https://www.eleanorhealth.com/blog/doctors-that-prescribe-methadone>

¹² *Medication Assisted Treatment for Opioid Use Disorders*, 42 C.F.R. § 8.12. <https://www.ecfr.gov/current/title-42/chapter-I/subchapter-A/part-8>

¹³ *Federal Opioid Treatment Standards*. (n.d.) Cornell Law School. <https://www.law.cornell.edu/cfr/text/42/8.12>

¹⁴ *Rehabilitative Services Policy*. (n.d.). Executive Office of Health and Human Services.

<https://eohhs.ri.gov/ProvidersPartners/ProviderManualsGuidelines/MedicaidProviderManual/RehabilitativeService/SubstanceAbuseTreatmentServices.aspx#15.27>

¹⁵ Center for Substance Abuse Treatment. (2010). *Chapter 4—Assessment*. Substance Abuse and Mental Health Services Administration (US). <https://www.ncbi.nlm.nih.gov/books/NBK64828/>

¹⁶ *Home Health Care Services Payment Policy*. (n.d.). Neighborhood Health Plan of Rhode Island <https://www.nhpi.org/wp-content/uploads/2020/11/Home-Health-Services-Payment-Policy-11.03.20.pdf>

- **Provider credentialing requirements.** These services can be performed with a Home Health Aide License, a Certified Nursing Assistant License, or an appropriately trained homemaker. Individuals can get Home Health Aide credentials through the National Association of Home Care and Hospice.¹⁷
- **Professional types currently providing the service.** These services can be provided by either a Home Health Aide (HHA), Homemaker, or a Certified Nursing Assistant (CNA).¹¹
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** These services are reimbursed in 15-minute increments.
- **Rate Observations.** S5125 may be billed with or without modifiers for shift differential, high client acuity, and also with or without rate enhancements which provide rate additions if the provider meets certain credentialing, educational, and quality criteria. S5125 may also be billed with a U1 modifier to indicate the combination of homemaker and attendant care services.

HOMEMAKER SERVICE, NOS; PER 15 MINUTES (S5130)

- **Services performed and requirements.** These services include assistance with general household activities and chores required for a safe living environment.¹⁸
- **Provider credentialing requirements.** These services can be performed with a Home Health Aide License, a Certified Nursing Assistant License, or by an appropriately trained homemaker.
- **Professional types currently providing the service.** These services can be provided by either a HHA, Licensed Practical Nurse (LPN), CNA, or appropriately trained homemaker.
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** These services are reimbursed fee-for-service in 15-minute increments.
- **Rate Observations.** S5130 may be billed with a modifier which indicates the credentials of the provider. If a provider has LPN credentials, and uses the appropriate rate modifier, they will receive a higher reimbursement rate for services rendered.

NURSING ASSESSMENT / EVALUATION (T1001).

- **Services performed and requirements.** During a nursing assessment, a nurse will gather information regarding the health status of the patient utilizing services.¹⁹ This can include verbal patient data collection on information such as medical history and prescription medications, and it can also include hands on services such as taking vital signs.
- **Provider credentialing requirements.** The provider must be a registered nurse (RN) to perform this assessment.²⁰
- **Professional types currently providing the service.** Registered nurses perform this service.
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** This is reimbursed per assessment.
- **Rate Observations.** No variations were observed in rates for T1001 based upon the credentials of the administering provider.

PRIVATE DUTY / INDEPENDENT NURSING SERVICE(S) - LICENSED, UP TO 15 MINUTES (T1000)

- **Services performed and requirements.** Private duty/independent nurses perform typical nursing duties, such as assessment, medication and treatment administration, care plan explanation, and support to patients and their families. Services are often provided in a home.

¹⁷ CNA Classes & Programs in Rhode Island. (n.d.). Registerednursing.org. <https://www.registerednursing.org/certified-nursing-assistant/programs/rhode-island/>

¹⁸ Types of Home Health Care Services. (2020). Johns Hopkins Medicine. <https://www.hopkinsmedicine.org/health/caregiving/types-of-home-health-care-services>

¹⁹ Toney-Butler, T. J., & Unison-Pace, W. J. (2023). *Nursing Admission Assessment and Examination*. PubMed; StatPearls Publishing. <https://www.ncbi.nlm.nih.gov/books/NBK493211/#:-:text=%5B1%5D%5B2%5D%5B3%5D%20The%20nursing%20assessment%20includes%20gathering%20information%20concerning>

²⁰ DEEOIC Home Health Care Update: Prior Authorization No Longer Required for T1001-Nursing Assessment/Evaluation. (n.d.). U.S. Department of Labor. https://www.dol.gov/agencies/owcp/energy/regs/compliance/hhc_update_061118

- **Provider credentialing requirements.** Each provider needs nursing credentials to provide these services.
- **Professional types currently providing the service.** LPN and RN credentialed providers independent of care facilities perform these services, typically in a home-based setting.
- **Associated clinical administrative and supervision requirements.** Private duty or independent nurses may work with an agency with administrative oversight, or they may operate in an independent capacity.²¹
- **Reimbursement mechanism.** These services are reimbursed fee-for-service in 15-minute increments.
- **Rate Observations.** T1000 may be billed with a modifier which indicates the credentials of the provider. If a provider has LPN credentials, and uses the appropriate rate modifier, they will receive a lower reimbursement rate for services rendered. The rate billed without the modifier reflects the service being performed by a RN.

Conclusion

In conducting home care and substance use disorder treatment services, personnel have a wide array of credentials and responsibilities. These range from no medical or clinical background to advanced degrees in clinical fields. Rate structures for certain services incorporate modifiers that can be added onto HCPCs codes that adjust rates based on the credentialing of the provider. Further, some of the services, such as counseling or private duty nursing are reimbursed in 15-minute increments, as opposed to others which are reimbursed per unit of treatment or per service. A baseline understanding of the service delivery requirements and reimbursement structure is necessary to refine rate benchmarks to reflect the services provided in Rhode Island social and human service programs. This baseline understanding will enable a more accurate comparison of rates across different markets and help to develop insight into the ability of Rhode Island to retain sufficient professional resources to ensure accessible and high-quality care.

Limitations and data reliance

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The services provided for this project were performed under the contract between Milliman and OHIC dated January 26, 2023.

Guidelines issued by the American Academy of Actuaries require actuaries to include their professional qualifications in all actuarial communications. Jason Clarkson and Ian McCulla are members of the American Academy of Actuaries and meet the qualification standards for performing the analyses in this report.

²¹ *How to Become an Independent Private Duty Nurse.* (2019, August 15). Career Trend. <https://careertrend.com/become-independent-private-duty-nurse-36809.html>