

Social and human service programs review: Professional and personnel requirements

Rhode Island, Office of the Health Insurance Commissioner

August 30, 2023

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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 nine assessments covering various rate and programmatic elements of the social and human service programs, with a final assessment being a culmination of the prior nine assessments. 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. As a whole, this series of reports may be used as one set of resources to provide education and insight into current Rhode Island social and human service programs' provider reimbursement and programmatic structure.

The assessments were completed in two phases with the first phase published in May 2023, and second phase published by September 1, 2023. The first phase included the nine assessments with a limited scope of services. The second phase is cumulative encompassing all information presented in the first phase reports with any applicable updates and additional programs or services reviewed. The second phase will conclude with a 10th report, published by OHIC, which will contain recommended provider reimbursement rate adjustments and other findings from the review.

This 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 different service offerings and the credentialing and personnel requirements for each service. In addition to supporting other 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. This overview may be leveraged as a reference and may inform the development of assumptions included in provider reimbursement rate development activities conducted as part of the broader reimbursement rate review process.

Description of Services for Review

In this report, we examine 27 services, all related to behavioral health, early intervention, home care, and substance use disorder services. This report establishes a common understanding of the variations in credentials and providers who render social and human services in Rhode Island. 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 prioritized certain services and tasks to be included in this report. Our approach to prioritization was informed by quantitative and qualitative considerations. These factors 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 when 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.
- **Enrollment.** 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. If a service was especially complex and/or required extensive stakeholder feedback that could not be obtained in the given timeline for this effort, those services may not have been selected for this review.

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 Services.** We worked to evaluate a diverse set of services to ensure spread across the primary domains (Children’s Services, Behavioral Health, Home and Community-Based Services, Intellectual and Developmental Disability).

Taking all these considerations into account, we worked with OHIC to select services for evaluation within this report.

BEHAVIORAL HEALTH SERVICE CODES

Psychiatric diagnostic interview examination including history, mental status, or disposition (90791)
Psychotherapy, 30 minutes with patient and/or family member (90832)
Psychotherapy, 45 minutes with patient and/or family member (90834)
Psychotherapy, office/outpatient facility, 60 minutes face to face with the patient (90837)
Family psychotherapy (without patient present) (90846)
Family psychotherapy (with patient present) (90847)
Group psychotherapy (other than of a multiple family group) (90853)
Psychiatric diagnostic interview examination including history, mental status, or disposition (90792)
Office or other outpatient visit for the evaluation and management of an established patient - 10 min (99212)
Office or other outpatient visit for the evaluation and management of an established patient - 15 min (99213)
Office or other outpatient visit for the evaluation and management of an established patient - 25 min (99214)
Office or other outpatient visit for the evaluation and management of an established patient - 40 min (99215)
Office or other outpatient visit for the evaluation and management of an established patient - 5 min (99211)
Integrated Health Home (H0037)
Assertive Community Treatment (ACT) (H0040)

EARLY INTERVENTION SERVICE CODES

Comprehensive multidisciplinary evaluation (H2000)
Case management, each 15 minutes (T1016)
Team evaluation & management, per encounter (T1024)
Family training and counseling for child development, per 15 minutes (T1027)

HOME CARE (PERSONAL CARE AND NURSING)

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.

SUBSTANCE USE DISORDER TREATMENT SERVICES

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.

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

Figure 1 summarizes the services, provider types, and reimbursement mechanisms for the selected Healthcare Common Procedure Coding System (HCPCS) codes for behavioral health, early intervention, home care, and substance use disorder services.

FIGURE 1 – Summary of Personnel Requirements

HCPCS CODE	CREDENTIALING REQUIREMENTS	PROFESSIONAL TYPES	CLINICAL OVERSIGHT REQUIREMENTS	UNITS OF REIMBURSEMENT
Behavioral Health				
90791	Standard for Professional Type Licensure	Psychiatrists, clinical psychologists, licensed professional counselors, licensed clinical social workers, and licensed marriage and family therapists	None	Per examination
90792	Standard for Professional Type Licensure	Psychiatrists, psychiatric nurse practitioners, and physician assistants	None	Per examination
90832; 90834; 90837; 90846; 90847; 90853	Standard for Professional Type Licensure	Psychiatrists, psychologists, licensed social workers, licensed marriage and family therapists	None	30, 45, or 60-minute increments
99211 - 99215	Standard for Professional Type Licensure	Physicians and ancillary staff	None	5 - 40-minute increments
H0037; H0040	Licensed by BHDDH	Care managers, therapists, psychiatrists, registered nurses, addiction specialists, and other social services providers	Data submission to BHDDH	Per diem
Early Intervention				
H2000	Adhere to EOHHS ¹ Rhode Island Early Intervention Certification Standards	Audiologists, board certified behavior analysts, educators, early interventionists, marriage and family therapists, mental health counselors, physicians, psychiatrists, nurses, registered dietitians, occupational therapists, optometrists/ophthalmologists, physical therapists, psychologists, social workers, and speech language pathologists	Data submission to EOHHS	Per evaluation
T1016	Adhere to EOHHS ¹ Rhode Island Early Intervention Certification Standards	No specified provider type, often nurses	Data submission to EOHHS	15-minute increments
T1024; T1027	Adhere to EOHHS ¹ Rhode Island Early Intervention Certification Standards	Audiologists, board certified behavior analysts, educators, early interventionists, marriage and family therapists, mental health counselors, physicians, psychiatrists, nurses, registered dietitians, occupational therapists, optometrists/ophthalmologists, physical therapists, psychologists, social workers, and speech language pathologists	Data submission to EOHHS	Per encounter; 15-minute increments

HCPCS CODE	CREDENTIALING REQUIREMENTS	PROFESSIONAL TYPES	CLINICAL OVERSIGHT REQUIREMENTS	UNITS OF REIMBURSEMENT
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 (RN)	None Identified	Per assessment
T1000	LPN and RN	Registered nurse, licensed practical nurse (LPN)	Potential oversight by an agency or independent operation	15-minute increments
Substance Use Disorder Treatment Services				
H0004	ADC, PADC, CADC, CAADC, and CCS ¹	Physician, licensed psychologist, registered nurse, social worker	None Identified	15-minute increments
H0005	ADC, PADC, CADC, CAADC, and CCS ¹	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 ¹	Addiction counselor	None Identified	60-90 minute session

Notes

1. Abbreviations used in the figure above are defined in the sections that follow.

Credentialing requirements are based upon national standards as required by discipline boards and regulations. 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.

BEHAVIORAL HEALTH SERVICES

PSYCHIATRIC DIAGNOSTIC INTERVIEW EXAMINATION INCLUDING HISTORY, MENTAL STATUS, OR DISPOSITION (90791, 90792)

- **Services performed and requirements.** 90791 is a CPT code used for a diagnostic exam without medical services, whereas 90792 is used for a diagnostic exam with medical services.⁴
- **Provider credentialing requirements.** No additional credentials identified beyond those noted in professional type below.
- **Professional types currently providing the service.** Psychiatrists, clinical psychologists, licensed professional counselors, licensed clinical social workers, and licensed marriage and family therapists can provide these services⁴. 90791 is used by psychologists, social workers, and other behavioral health professionals. 90792 can be billed by psychiatrists, psychiatric nurse practitioners, and physician assistants.⁵
- **Associated clinical administrative and supervision requirements.** None.
- **Reimbursement mechanism.** These codes are reimbursed per examination and have various modifiers depending on the professional type of the provider.
- **Rhode Island Rate Observations.** Rates will vary based upon the credentials of the provider delivering the service.

PSYCHOTHERAPY (90832, 90834, 90837, 90846, 90847, 90853)

- **Services performed and requirements.** Psychotherapy is a service provided to individuals or families to provide support in helping cope with stressful life events or specific mental health conditions. It is often used in coordination with medication.⁶
- **Provider credentialing requirements.** No additional credentials identified beyond those identified in professional type below.
- **Professional types currently providing the service.** According to the American Psychiatric Association, the following providers are eligible to provide psychotherapy services: psychiatrists, psychologists, licensed social workers, licensed marriage and family therapists, and others with specialized training in psychotherapy.⁶
- **Associated clinical administrative and supervision requirements.** None.
- **Reimbursement mechanism.** Psychotherapy has multiple different reimbursement factors. Firstly, psychotherapy can occur with only a patient, a patient and family member(s), with family member(s) and without the patient, and in a group setting. There are also different time increments for reimbursement such as 30, 45, and 60 minutes.
- **Rhode Island Rate Observations.** Rates vary based upon the credentials of the provider delivering the service and the duration of the service. Services may be billed with different modifiers to denote the credentials of the provider delivering the service.

OFFICE OR OTHER OUTPATIENT VISIT FOR THE EVALUATION AND MANAGEMENT OF AN ESTABLISHED PATIENT (99211, 99212, 99213, 99214, 99215)

- **Services performed and requirements.** There are three components of this service: history, examination, and medical decision-making. These codes are only used for patients that are already established.⁷
- **Provider credentialing requirements.** No additional credentials identified beyond those identified in professional type below.

⁴ What you need to know about 90781. (n.d.). Therapy Notes, <https://blog.therapynotes.com/what-you-need-to-know-about-90791>

⁵ Psychiatric diagnostic evaluation. (n.d.). CodingIntel, <https://codingintel.com/psychiatric-diagnostic-evaluation/>

⁶ What is psychotherapy? (n.d.). American Psychiatric Association. <https://www.psychiatry.org/patients-families/psychotherapy#:~:text=Psychotherapy%20can%20be%20provided%20by,with%20specialized%20training%20in%20psychotherapy.>

- **Professional types currently providing the service.** Physicians and ancillary staff are allowed to provide and bill this service as long as the documentation states who performed the service and their credentials.⁷
- **Associated clinical administrative and supervision requirements.** None.
- **Reimbursement mechanism.** These codes are all billed in one unit per visit. The allotted time is represented in each code, and it varies from 10 minutes to 40 minutes.⁷
- **Rhode Island Rate Observations.** Rates vary based upon the code billed. Codes represent varying duration and complexity of the patient visit.

INTEGRATED HEALTH HOME (IHH) (H0037)

- **Services performed and requirements.** IHHs provide four areas of service: care coordination and health promotion, chronic condition and population management, comprehensive traditional care, and individual and family support services. Services combine the coordination of primary, specialty, and behavioral healthcare for those with multiple chronic illnesses.⁸ Eligible participants are identified by their diagnosis code and the Daily Living Activities Functional Assessment.⁹
- **Provider credentialing requirements.** IHHs have to be licensed by the Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) in order to provide and bill IHH services.^{Error! Bookmark not defined.}
- **Professional types currently providing the service.** IHHs consist of care teams that include: care managers, therapists, psychiatrists, registered nurses, addiction specialists (as needed), and individuals providing social services such as employment (non-clinical), activities of daily living, and interpersonal relationship skills.^{Error! Bookmark not defined.}
- **Associated clinical administrative and supervision requirements.** All IHH and ACT service providers must submit data to BHDDH via the Behavioral Health Online Database.^{Error! Bookmark not defined.}
- **Reimbursement mechanism.** This is a per diem reimbursement.
- **Rhode Island Rate observations.** None.

ASSERTIVE COMMUNITY TREATMENT (ACT) (H0040)

- **Services performed and requirements.** The ACT team is a mobile team that provides integrated clinical treatment, rehabilitation, and other supportive services in various community locations.¹⁰
- **Provider credentialing requirements.** ACTs have to be licensed by the Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals (BHDDH) in order to provide and bill ACT services.^{Error! Bookmark not defined.}
- **Professional types currently providing the service.** ACTs have the same provider types as IHHs including care teams that include: care managers, therapists, psychiatrists, registered nurses, addiction specialists (as needed), and individuals providing social services such as employment (non-clinical), activities of daily living, and interpersonal relationship skills.^{Error! Bookmark not defined.}
- **Associated clinical administrative and supervision requirements.** All IHH and ACT service providers must submit data to BHDDH via the Behavioral Health Online Database.¹¹
- **Reimbursement mechanism.** This is a per diem reimbursement.
- **Rhode Island Rate observations.** None

⁷ Established patient office visit. (n.d.). Medicare Payment and Reimbursement. <https://medicarepaymentandreimbursement.com/2010/10/time-guideline-for-9921>

⁸ Integrated Health Home. (n.d.). Executive Office of Health and Human Service. <https://eohhs.ri.gov/sites/g/files/xkgbur226/files/2021-11/integrated-health-home.pdf>

⁹ Integrated Health Home and Assertive Community Treatment Programs – Adult. (n.d.). Tufts Health Plan. <https://tuftshealthplan.com/provider/behavioral-health/public-plans/ri-adult-ihh-and-act-programs>

¹⁰ Integrated Health Home (IHH) and Assertive Community Treatment (ACT) Program Provider Billing Manual. (2017). Executive Office of Health and Human Services. <https://eohhs.ri.gov/sites/g/files/xkgbur226/files/2021-10/4.5-ihh-and-act-program-billing-manual-for-ri-draft.pdf>

¹¹ Reporting Requirements. (n.d.). Department of Behavioral Healthcare, Developmental Disabilities & Hospitals. <https://bhddh.ri.gov/mental-health/provider-and-professional-information>

EARLY INTERVENTION SERVICES

COMPREHENSIVE MULTIDISCIPLINARY EVALUATION (H2000)

- **Services performed and requirements.** A multidisciplinary evaluation is used to determine the eligibility of the child to enter the program. It identifies the needs of the child, their level of development, and appropriate services.¹²
- **Provider credentialing requirements.** All Early Intervention Programs have to adhere to EOHHS' Rhode Island Early Intervention Certification Standards.
- **Professional types currently providing the service.** The professional types performing the service are dependent upon the presenting concerns and familial questions. At least two team members need to be present, and they have to be from two different disciplines.¹²
- **Associated clinical administrative and supervision requirements.** The assessment must be summarized on the Rhode Island Early Intervention/Early Childhood Special Education Child Outcomes Summary Form.¹²
- **Reimbursement mechanism.** This service is reimbursed per evaluation.
- **Rate Observations.** No observed rate variation.

SERVICE COORDINATION, EACH 15 MINUTES (T1016)

- **Services performed and requirements.** Billing this code includes service coordination activities.
- **Provider credentialing requirements.** All Early Intervention Programs have to adhere to EOHHS' Rhode Island Early Intervention Certification Standards.
- **Professional types currently providing the service.** These services are provided by a large number of professional types, depending on the individual and family needs. Professionals may include Registered Nurse, Physical Therapist, Occupational Therapists, Speech Pathologists, Clinical Social Workers, and Educators.
- **Associated clinical administrative and supervision requirements.** Early Intervention providers must utilize the most current version of state required paperwork/forms to assure reliable and consistent data collection. Data must be submitted to the Rhode Island Early Intervention Care Coordination System.^{12,15}
- **Reimbursement mechanism.** This service is reimbursed in 15-minute increments.
- **Rhode Island Rate observations.** Rates vary based upon the number of staff involved in the activity. Rate may be reimbursed with different modifiers to indicate the number of staff involved.

TEAM EVALUATION & MANAGEMENT PER ENCOUNTER (T1024)

- **Services performed and requirements.** This service consists of evaluation and treatment by a specialty team that can provide coordinated care for multiple or severely handicapped children.¹³
- **Provider credentialing requirements.** All Early Intervention Programs have to adhere to EOHHS' Rhode Island Early Intervention Certification Standards.
- **Professional types currently providing the service.** These services are provided by a large number of professional types, depending on the individual and family needs. The following professionals are included in early intervention services: audiologists, board certified behavior analysts, educators, early interventionists, marriage and family therapists, mental health counselors, physicians, psychiatrists, nurses, registered dietitians, occupational therapists, optometrists/ophthalmologists, physical therapists, psychologists, social workers, and speech language pathologists.¹⁴

¹² Multidisciplinary Evaluation/Assessment. (2018). Executive Office of Health and Human Services. <https://eohhs.ri.gov/sites/g/files/xkgbur226/files/Portals/0/Uploads/Documents/Early-Intervention/EICertificationStandardsVEvalandAssessment.pdf>

¹³ HCPCS Code T1024. (n.d.). HCPCS Codes. <https://hcpcs.codes/t-codes/T1024/>

¹⁴ Personnel Table A. Early Intervention Professional Qualification. (2020). Executive Office of Health and Human Services. <https://eohhs.ri.gov/sites/g/files/xkgbur226/files/Portals/0/Uploads/Documents/Early-Intervention/2020EICertificationStandardsPoliciesandProceduresXIQualifiedPersonnelTableA.pdf>

- **Associated clinical administrative and supervision requirements.** Early Intervention providers must utilize the most current version of state required paperwork/forms to assure reliable and consistent data collection. Data must be submitted to the Rhode Island Early Intervention Care Coordination System.¹⁵
- **Reimbursement mechanism.** This service is reimbursed per 15 minutes.
- **Rhode Island Rate observations.** Rates vary based upon the credentials of the practitioner providing the service and the associated modifier used.

FAMILY TRAINING AND COUNSELING FOR CHILD DEVELOPMENT, PER 15 MINUTES (T1027)

- **Services performed and requirements.** This service consists of supportive child development activities, such as counseling and training, for the family.
- **Provider credentialing requirements.** All Early Intervention Programs have to adhere to EOHHS' Rhode Island Early Intervention Certification Standards.
- **Professional types currently providing the service.** These services are provided by a large number of professional types, depending on the individual and family needs. The following professionals are included in early intervention services: audiologists, board certified behavior analysts, educators, early interventionists, marriage and family therapists, mental health counselors, physicians, psychiatrists, nurses, registered dietitians, occupational therapists, optometrists/ophthalmologists, physical therapists, psychologists, social workers, and speech language pathologists.¹⁶
- **Associated clinical administrative and supervision requirements.** Early Intervention providers must utilize the most current version of state required paperwork/forms to assure reliable and consistent data collection. Data must be submitted to the Rhode Island Early Intervention Care Coordination System.¹⁵
- **Reimbursement mechanism.** This service is reimbursed in 15-minute increments.
- **Rhode Island Rate observations.** Rates vary based upon the credentials of the practitioner providing the service and the associated modifier used.

HOME CARE SERVICES

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.¹⁷
- **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.¹⁸
- **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).¹⁸
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** These services are reimbursed in 15-minute increments.
- **Rhode Island 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.

¹⁵ Administration. (2020). Executive Office of Health and Human Services. <https://eohhs.ri.gov/sites/g/files/xkgbur226/files/Portals/0/Uploads/Documents/Early-Intervention/2020EICertificationStandardsPoliciesandProceduresXIIAdministration.pdf>

¹⁶ Personnel Table A. Early Intervention Professional Qualification. (2020). Executive Office of Health and Human Services. <https://eohhs.ri.gov/sites/g/files/xkgbur226/files/Portals/0/Uploads/Documents/Early-Intervention/2020EICertificationStandardsPoliciesandProceduresXIQualifiedPersonnelTableA.pdf>

¹⁷ Home Health Care Services Payment Policy. (n.d.). Neighborhood Health Plan of Rhode Island <https://www.nhpri.org/wp-content/uploads/2020/11/Home-Health-Services-Payment-Policy-11.03.20.pdf>

¹⁸ CNA Classes & Programs in Rhode Island. (n.d.). Registerednursing.org. <https://www.registerednursing.org/certified-nursing-assistant/programs/rhode-island/>

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.¹⁹
- **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.
- **Rhode Island 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.²⁰ 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 at least a registered nurse (RN) to perform this assessment.²¹
- **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.
- **Rhode Island 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 the client's home.
- **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.²²
- **Reimbursement mechanism.** These services are reimbursed fee-for-service in 15-minute increments.
- **Rhode Island 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.

¹⁹ Types of Home Health Care Services. (2020). Johns Hopkins Medicine. <https://www.hopkinsmedicine.org/health/caregiving/types-of-home-health-care-services>

²⁰ 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>

²¹ 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

²² How to Become an Independent Private Duty Nurse. (2019, August 15). Career Trend. <https://careertrend.com/become-independent-private-duty-nurse-36809.html>

SUBSTANCE USE DISORDER TREATMENT 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.²³
- **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 counselor²⁴. 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.²⁵
- **Professional types currently providing the service.** An array of providers performs these services in Rhode Island. These providers include physicians, registered nurses, licensed psychologists, Master certified social worker (MSW), marriage and family therapist, and counselors.²⁶
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** These services are reimbursed fee-for-service per 15-minute increment.
- **Rhode Island 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.²⁷
- **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 code is reimbursed fee-for-service for a typically 40-50 minute session.
- **Rhode Island Rate observations.** For H0005, rates do not vary based upon the credentials of the provider delivering the service.

²³ What Does a Substance Abuse Counselor Do? (n.d.). Verywell Mind. <https://www.verywellmind.com/what-does-a-substance-abuse-counselor-do-5442995>

²⁴ Clinician's Services. (n.d.) Executive Office of Health and Human Services.

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

²⁵ 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>

²⁶ Clinician's Services. (n.d.). Executive Office of Health and Human Services.

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

²⁷ 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.²⁸ 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).²⁹
- **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.^{30, 31, 32} Treatment plans must be approved by a program clinical director.³³
- **Reimbursement mechanism.** These services are reimbursed fee-for-service for one unit each week.
- **Rhode Island 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.³⁴
- **Associated clinical administrative and supervision requirements.** None identified.
- **Reimbursement mechanism.** This code is reimbursed as fee-for-service for a 60-90 minute (typically 60 minutes) session.
- **Rhode Island Rate observations.** No variations were observed in rates for H0001 based upon the credentials of the administering provider.

Conclusion

There is a range of professional types, credentials, and responsibilities across the reviewed services. These professional types range from those having no medical or clinical credential requirements, such as case managers and social support service providers, to requiring practitioners to have advanced degrees in clinical fields, such as psychiatrists. The selected services can be reimbursed in time increments, per visit, or per diem.

²⁸ What Is Methadone? (2017, August 30). WebMD. <https://www.webmd.com/mental-health/addiction/what-is-methadone>

²⁹ 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>

³⁰ Doctors that Prescribe Methadone. (2021, August 4). Eleanor Health. <https://www.eleanorhealth.com/blog/doctors-that-prescribe-methadone>

³¹ 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>

³² Federal Opioid Treatment Standards. (n.d.) Cornell Law School. <https://www.law.cornell.edu/cfr/text/42/8.12>

³³ Rehabilitative Services Policy. (n.d.). Executive Office of Health and Human Services.

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

³⁴ 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/>

Rate structures for certain services incorporate modifiers that can be added onto HCPCS codes that adjust rates based on the credentialing of the provider. 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 functional information 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.

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