



Rhode Island Executive Office of Health and Human Services
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Name of Regulation: **210-RICR-20-00-3**
 Posted for Public Comment on **8/3/21**
 Public hearing held on **N/A**
 Comment Period Ended on **9/2/21**
 Summary Response to Comments **9/2/21**

	Respondent	Nature of the Comments	EOHHS' Response
1.	Name Title Organization Date Submitted	Summary of comment received	EOHHS response, if applicable
2.	James Carney Director of Advocacy and Government Relations Rhode Island Academy of Physician Assistants 8/30/21	Request amendment to allow PAs to provide the written medical justification for Medicaid beneficiaries to receive out of state services as they have the training and experience that qualifies them to do so, and limiting this responsibility to physicians may create delays to necessary care for Rhode Island Medicaid beneficiaries.	EOHHS appreciates this feedback. At this time, EOHHS will not be changing its policy to allow providers who are not licensed physicians to submit requests for prior authorizations. However, EOHHS will take this into consideration and research whether it has the authority to do so, whether there are any federal prohibitions against doing so, and whether such a policy change is warranted. If EOHHS decides to change this policy, a proposed regulation will be posted for a 30-day public comment period.
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