



Rhode Island Executive Office of Health and Human Services  
3 West Road, Virks Building, Cranston, RI 02920  
phone: 401.462.5274 fax: 401.462.3677

Name of Regulation: 210-50-00-4: Medicaid Long-Term Services and Supports Application and Renewal Process

Posted for Public Comment on 1/16/25

Comment Period Ended on 2/15/25

Summary Response to Comments: 7/28/25

	Respondent	Nature of the Comments	EOHHS' Response
1.	Sam Bell	<p>Concern regarding whether or not EOHHS has authority to use commercial data sources other than TWN</p> <p>Concern regarding accuracy of data</p> <p>Implies that the reason the State is choosing to use commercial data sources is to increase the number of eligibility denials</p>	<p>The State will be using The Work Number.</p> <p>The income data provided via The Work Number is taken directly from employer's payroll records. The Work Number is not permitted to modify the information received from the employer. System controls are in place to ensure the information utilized by the Medicaid program is limited to the information pertinent to an eligibility determination. Another reason for confidence in the accuracy of this source is that since July 2024, the Centers for Medicare &amp; Medicaid Services (CMS) has held a private, commercial contract with The Work Number to provide current income data through the Verify Current Income (VCI) Hub service with the Current Sources of Income (CSI) contractor. The Work Number provides current income information sourced from employer-reports and job status data that is updated each employer payroll period.</p> <p>EOHHS is adding The Work Number as an additional data source to improve the verification of financial eligibility for Medicaid members. The State currently utilizes the State Wage Information Collection Agency (SWICA) data from the RI Department of Labor and Training to verify financial eligibility for Medicaid applicants and existing members. SWICA is updated by DLT on a quarterly basis and only provides income details for in-state employers. These limitations can lead to inaccurate verifications of financial eligibility.</p> <p>The more accurate data from commercial sources would not necessarily lead to a higher number of terminations. Instead, it would result in more accurate eligibility determinations across the board. For example, if an individual lost their job within the last month, the DLT data could be from the prior quarter and reflect historical wages from when the member was employed. Since The Work Number data is updated by pay period, the data used to determine eligibility in this scenario would reflect the loss of employment that occurred within the last month. The State would confirm the members attestation of no wages with the information received from The Work Number.</p>



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		Concern around removing the IRS deduction	The tuition and fees deduction was removed by the IRS and was not available after 2020. Instead the income limitations for the lifetime learning credit were increased by the IRS (IRS Publication 17, 2021).
2.	Shamus Durac RIPIN	Concern with: <ul style="list-style-type: none"><li>• placing trust in a private corporation that is not accountable to the public in the way government-controlled data sources are</li><li>• Accuracy of information- outdated info, mixing up individuals with similar names or people living at the same address, issues for those who have been victims of identity fraud</li><li>• Difficulty of disputing inaccurate information</li><li>• Exposing Medicaid applicants to data theft</li></ul>	<p>The accuracy of data from The Work Number is supported by the fact that it is the source for CMS's "VCI Hub," as well as the fact that it is updated more often than SWICA and includes employment data from non-RI employers. In accordance with RI state law, individuals will be identified based on their name as well as their Social Security Number, which should minimize identification errors of the kind raised by this comment.</p> <p>EOHHS's use of The Work Number data will not expose applicants or beneficiaries to a higher risk of data theft, because individuals' data is already housed in The Work Number currently, whether or not EOHHS accesses it. EOHHS's use of the data does not create any new opportunities for data theft.</p>