



Rhode Island Executive Office of Health and Human Services  
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Name of Regulation: 210-RICR-20-00-1: Medicaid Payments and Providers  
Posted for Public Comment on 5/12/25  
Comment Period Ended on 6/13/25  
Summary Response to Comments 8/18/25

|    | Respondent                        | Nature of the Comments  | EOHHS' Response  |
|----|-----------------------------------|---|--|
| 1. | <a href="#">Nancy Silva RIPIN</a> | <p>Expressed concerns that classification of CHWs as high-risk providers will have unintended negative consequences on availability of CHW services</p> <ul style="list-style-type: none"><li>• Disincentivize agencies from hiring CHW positions that would bill Medicaid</li><li>• Decrease Medicaid member access to many CHW related services</li><li>• RI has existing authority and capacity to impose stricter enrollment/revalidation requirements on particular "bad actor" CHWs more narrowly which RIPIN encourages as an alternative to the measures taken in this regulation [see process described at <a href="#">42 CFR § 424.518(c)(3)</a>]</li></ul> | <p>The level of fraud discovered is too widespread for the solution described at <a href="#">42 CFR 424.518(c)(3)</a> to be effective. The classification of CHWs as high risk providers is the only available mechanism to adequately address the scope of this problem. EOHHS appreciates the commenter's concerns about access; however, the agency's primary responsibility is to protect the health and safety of Medicaid members, and EOHHS has determined that this approach is necessary to meet this responsibility.</p> |