



Responses to Public Comments: Home Care Rates

Public Comment Period June 29, 2021 – July 29, 2021

Category	Nature of the Comments	EOHHS' Response
Shift Differential Increase	<ol style="list-style-type: none"> 1. The shift differential is a 100% wage pass-through and adds to the financial burden and costs to providers, specifically costs that are payroll contingent, including increased payroll taxes, workers compensation insurance and professional liability insurance. 2. The shift differential is unsustainable and will require that providers reduce Medicaid case ratios. 	<p>EOHHS acknowledges the potential for a slight increase to payroll tax and professional liability costs to providers that are a consequence of any wage pass-through increase. EOHHS anticipates providers should see reduced costs due to decreased turn over and reduced overtime, which should help offset the potential slight increases to payroll and professional liability costs. Further, the wage pass through applies only to the additional amount in the passed FY 22 budget initiative. Should costs be increased, there are other available funds from Medicaid to provide for that administration.</p> <p>The investment of an additional \$ 0.6 million directly into the Home Care workforce will benefit providers. This investment will help providers better recruit and retain a quality workforce to better serve Medicaid beneficiaries during hours that are particularly difficult to staff. Providers have stated that they have difficulty recruiting individuals based on salary. Providing additional funding for salary to go to workers is the purpose of this initiative.</p> <p>A reduction in Medicaid caseloads by providers should not be a result of an increased investment into the Home Care workforce by the Medicaid program. EOHHS remains committed to working with providers to ensure network adequacy for Medicaid beneficiaries. EOHHS will be issuing formal guidance for providers regarding implementing and reporting the wage pass-through programs. Increased providers costs may be payable through the existing shift differential, rather than the add on passed in the FY 22 budget that requires the wage pass through.</p>
Behavioral Healthcare Training Enhanced Reimbursement	<ol style="list-style-type: none"> 3. The Behavioral Health Training Program is 100% wage pass-through that is non-workable/attainable for providers that have workforce shortages and are still trying to recover from the COVID-19 public health emergency. 	<p>The Behavioral Health (BH) Training program is a program developed and offered to enhance the behavioral health care capabilities of direct care workforce to better serve the needs of Medicaid beneficiaries and to create a career advancement opportunity for direct care workers to improve workforce retention. Participation is voluntary. The BH rate enhancement will be paid for all units of Personal Care and Combined Personal Care/Homemaker; however, the rate enhancement must be passed-through only to BH-certified workers, which is projected to result in significant additional revenue for providers.</p> <p>The proposed amendment effective date for the new behavioral healthcare training enhancement, which is voluntary, is January 1, 2022 allowing for additional time for providers to recover from the COVID-19 public health emergency and associated workforce challenges. EOHHS will be issuing formal guidance for providers regarding implementing and reporting the wage pass-through programs.</p>

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Behavioral Healthcare Training Curriculum	<p>4. The behavioral health training program curriculum does not meet the minimum standards set by the Rhode Island Department of Health (RIDOH) for either paraprofessional or agency licensure.</p>	<p>The BH Training program for HCBS workers was established to better serve the behavioral health needs of Medicaid members and enhance the credentials and capabilities of the direct care workforce. It is not intended to create a new or meet an existing licensure, but rather is an addition to existing requirements. The curriculum is a 30-hour training specifically designed and tailored for the direct care workers at no cost to the provider and participation is voluntary. The intention of this training is not for licensure; it is to increase the knowledge and understanding of providers. This training will provide direct care workers with the knowledge and skills they need to appropriately modify their services to the needs of individuals who have behavioral health conditions. This online behavioral health training introduces frontline staff to behavioral health concepts, professional communication, common disorders and a variety of contexts in which behavioral health vulnerabilities may occur, and Screening Brief Intervention and Referral to Treatment (SBIRT) training. Front line staff will develop a useful awareness of behavioral health to inform their approach to their work responsibilities within healthcare contexts. The purpose of the rate increase is to further incentivize the direct care workforce to provide higher quality care to Medicaid members and continue to provide services to individuals who have behavioral health needs.</p>
Medicaid Program Priorities	<p>5. EOHHS should instead invest any new additional dollars on sustainable rates and reducing beneficiary wait lists. The current investment would only benefit a limited number of Medicaid cases.</p>	<p>EOHHS remains committed to working with providers to ensure reasonable costs are reimbursed and that network adequacy is maintained and improved for Medicaid beneficiaries. Increased wages and enhanced training for the Home Care workforce will benefit a wide array of HCBS providers, direct care workers and beneficiaries in the Medicaid program. The BH certification and shift differentials were identified by LTSS caseworkers and providers as solutions to help fill some of the most challenging service hours.</p>