



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.	Nancy Silva RIPIN	<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"> • Disincentivize agencies from hiring CHW positions that would bill Medicaid • Decrease Medicaid member access to many CHW related services • 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 42 CFR § 424.518(c)(3)] 	<p>The level of fraud discovered is too widespread for the solution described at 42 CFR 424.518(c)(3) 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>