



*Rhode  
Island's No  
Wrong Door  
Initiative*

**Title: Frequently Asked Questions  
(FAQs) Regarding Rhode Island's  
NWD Strategy and Implementation**  
*– Draft*

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Health and Human Services

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# BACKGROUND

The Rhode Island Executive Office of Health and Human Services (EOHHS) is leading a multi-phase, interagency project to redesign the State's long-term care system to align with the person-centered principles of "No Wrong Door" (NWD) advanced by the Federal Administration for Community Living.

The EOHHS is currently implementing Phase I of this effort, which focuses on enhancing pre-eligibility functions that assist people in need of or at-risk for long-term services and supports (LTSS) without regard to the payer source. The centerpiece of Phase I is implementing a statewide network to provide person-centered options counseling (PCOC), an interactive decision-support process to support consumers in making informed LTSS decisions. Our goal is to ensure that every Rhode Islander has access to PCOC to help them decide whether LTSS is necessary and, if so, which pathway and service options best suit their needs.

**This frequently asked questions (FAQ) listing will be updated on a regular basis as new questions are submitted and as Phase I activities are implemented.**

Additional materials describing Rhode Island's No Wrong Door System Three Phase Strategic Plan and Phase I implementation activities are posted on the [LTSS No Wrong Door page on the EOHHS website](#).

For questions regarding this effort, please email [OHHS.LTSSNWD@ohhs.ri.gov](mailto:OHHS.LTSSNWD@ohhs.ri.gov).

# QUESTIONS AND ANSWERS

## Section 1: No Wrong Door

Q1: What is No Wrong Door?

Date Added/Revised: December 18, 2020

No Wrong Door (NWD) is a framework or concept advanced by the Administration for Community Living (ACL) to create a single, state-wide system that supports consumers who need or may at some point need long-term services and supports (LTSS). Specifically, the NWD concept encompasses a set of operating principles that are designed to reorient the workings of an LTSS system of care to give the needs and preferences of individuals and families a greater voice.

Additional information is available at: <https://nwd.acl.gov/pdf/NWD-National-Elements.pdf>

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## Section 2: Person-Centered Options Counseling

### Q2: What is Person-Centered Options Counseling (PCOC)?

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Rhode Island's Executive Office of Health and Human Services (EOHHS) is developing a PCOC program state-wide to better support consumers in their search for long-term services and supports (LTSS). **PCOC is an interactive decision-support process that helps people assess and understand their LTSS needs, goals, and preferences.** This approach of supporting consumers is directed by the individual and may include caregivers, natural supports, or those who are legally authorized to represent the individual. PCOC emphasizes person-centered thinking to support consumers in making informed decisions about their LTSS options.

### Q3: Who is eligible to receive PCOC?

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Rhode Island's PCOC service will be available to the following consumers regardless of insurance type:

- Adults age 65 and older
- Adults with disabilities
- Adults with intellectual / developmental disabilities
- Youth in transition

### Q4: How is PCOC Delivered?

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PCOC is a multi-step approach of asking for and providing information, offering decision support, and offering assistance in accessing services and programs. Through the PCOC process, individuals and their families receive:

1. Unbiased information about relevant programs, support services, and financial resources to help pay for services
2. Support in determining next steps; and
3. Assistance accessing referral services.

### Q5: How will EOHHS ensure PCOC Counselors have the ability to make referrals that are specific to every individual's community and desired goals?

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The role of PCOC Counselor is to use the values of choice, direction, and control to provide detailed information on LTSS options/services and to streamline access to LTSS, with a focus on the person's strengths, goals, and preferences. By understanding the person's goals and preferences, the PCOC Counselor will suggest relevant resources and provide the appropriate amount of support to access these programs and services. PCOC Counselors will have access to a robust directory of state-wide resources as well as training to ensure consumers are connected to appropriate resources. Referrals are not to be made for every community and desired goal; however, the outlined process does include quality assurance reviews by the EOHHS or its designee.

## Q6: What happens if the consumer's goals are unrealistic?

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The PCOC Counselor will provide all necessary information for the person to make informed choices and decisions about their LTSS options. This includes providing person-centered information to support a consumer's understanding of all their LTSS options and longer-term goals. PCOC Counselors will employ person-centered thinking, a strength-based approach that provides information to people in meaningful way beginning with discovery and organizes support around what is important to the individual. PCOC is not service planning or care planning, and therefore is not defined by what the person is eligible for or is available to the person but understanding their goals and preferences to look towards longer-term solutions.

## Q7: When will PCOC be available and to whom?

Date Added/Revised: December 18, 2020

EOHHS anticipates offering PCOC to a limited number of LTSS consumers via a pilot program by February 2021. During the pilot program, PCOC will use a web-based tool to support PCOC intake and follow-up and will be provided by select staff within several state agencies including DHS, EOHHS, BHDDH, and The POINT. PCOC will be available to all LTSS consumers by July 1, 2021. As the PCOC process is currently under development, EOHHS will release additional information to stakeholders regarding its pilot program prior to its launch.

## Q8: When will the PCOC pilot training begin?

Date Added/Revised: December 18, 2020

EOHHS anticipates that basic PCOC training will be provided to PCOC Counselors by February 2021 (anticipated launch date of the PCOC pilot program).

## Q9: Will PCOC Counselors be prepared to offer services in other languages outside of English?

Date Added/Revised: December 18, 2020

Yes, PCOC will be offered in English and Spanish.

## Q10: Will PCOC replace the Personal Choice program?

Date Added/Revised: December 18, 2020

PCOC Counselors will review LTSS options and provide warm transfers to existing LTSS programs and services including the Personal Choice program and other LTSS programs. PCOC will not replace existing LTSS services since the purpose of PCOC is to assist the consumer to identify and access LTSS services.

## Q11: How will the PCOC process impact consumers entering into hospice?

Date Added/Revised: December 18, 2020

Hospice is an LTSS option that may be discussed with individuals receiving PCOC based on their preferences and goals.

## Q12: How will PCOC Counselors interact with the Program of All-Inclusive Care for the Elderly (PACE) program?

Date Added/Revised: December 18, 2020

PACE is an LTSS program that provides comprehensive medical and social services to certain frail, elderly people (participants) still living in the community. PACE is an LTSS program that may be discussed with people receiving PCOC based on their preferences and goals.

## Q13: If the full spectrum of LTSS options are not well known in Rhode Island, what will prompt individuals to call the POINT to seek information and assistance about available LTSS options?

Date Added/Revised: December 18, 2020

Marketing and outreach is a critical component of the PCOC program. EOHHS will lead marketing efforts in collaboration with several State agencies that market specific programs and conduct outreach to specific populations. EOHHS completed a draft marketing and outreach plan and anticipates releasing a final strategy in early 2021.

## Q14: How will PCOC be conflict free?

Date Added/Revised: December 18, 2020

To avoid conflict of interest, PCOC Counselors are not allowed to provide direct care services to consumers or offer any service in which he/she has a financial interest. The PCOC Counselor's only commitment should be toward helping the consumer build a life that makes sense for them. As the PCOC Counselor helps identify supports to help make that happen, he/she needs to be free of any biases and be guided only by the consumer and their identified goals and support needs.

## Q15: How will EOHHS ensure the PCOC network is properly resourced to support the level of service and fidelity outlined in the PCOC operational materials?

Date Added/Revised: December 18, 2020

EOHHS will collect and analyze various performance measures to evaluate the PCOC program. Several performance measures or data points will be used to assess PCOC Counselor capacity, including the number of people served and timeliness of services. In addition, the state will examine all resources available and will also pursue No Wrong Door claiming where possible.

## Q16: What process will consumers use to express PCOC satisfaction or quality concerns?

Date Added/Revised: December 18, 2020

The State anticipates releasing a consumer satisfaction survey as part of the full program launch in 2021 to assess consumer satisfaction, effectiveness of PCOC, and to help maintain and improve overall quality. The survey provides information about the quality of basic components of PCOC and gathers data about the program's effectiveness in helping individuals transition to or remain in the setting of their choice.

PCOC Counselors will be required to offer every PCOC consumer the opportunity to participate in a consumer survey at the completion of the counseling cycle.

**Q17: How will information gathered during the PCOC process be shared with other State agencies (e.g., DHS or BHDDH)?**

Date Added/Revised: December 18, 2020

The state contracted with WellSky to implement an IT solution to support intake and screening, PCOC, and other NWD functions. The IT solution will be used to share information across several State agencies including OHA, DHS, Medicaid and BHDDH.

**Q18: How will the PCOC system interact with the referral system offered via 211 or The POINT?**

Date Added/Revised: December 18, 2020

EOHHS is currently working with its IT vendor to determine how the PCOC system will interact with other State systems including The POINT and 211.

**Q19: Will consumers and their families/guardians have access to review and/or update their records?**

Date Added/Revised: December 18, 2020

Yes, the consumer and their family/guardians will have access to their records. EOHHS is current working with its IT vendor to determine how records will be made available to consumers and the overall process for how this information is requested from the State.

**Q20: Where can I learn more about NWD and PCOC in Rhode Island?**

Date Added/Revised: December 18, 2020

Additional materials describing Rhode Island's No Wrong Door System Three Phase Strategic Plan and Phase I implementation activities are posted on the [LTSS No Wrong Door page on the EOHHS website](#). Available resources include:

1. [Person-Centered Options Counseling Operational Manual](#): Provides an overview of PCOC and outlines the future design of the PCOC program in Rhode Island.
2. [Rhode Island's No Wrong Door System Three Phase Strategic Plan](#): Overview of Rhode Island's strategic plan and planned activities to achieve Rhode Island's Phase I efforts.
3. [PowerPoint Presentation Regarding Rhode Island's NWD System Three Phase Strategy Plan and Implementation of PCOC](#): Summarizes Rhode Island's NWD System Three Phase Strategic Plan, planned activities to support Phase I, and PCOC details. This presentation was used during stakeholder webinars on December 15-16, 2020.
  - o A recording of this presentation is available at: [VIDEO: EOHHS Implementing Phase 1: No Wrong Door Redesign Community Meeting](#).
4. [Person-Centered Options Counseling Fact Sheet](#): One-page summary of PCOC.
5. [Rhode Island's No Wrong Door System Three Phase Strategic Plan Fact Sheet](#): One-page summary of Rhode Island's NWD Strategy.