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TO: Amy Katzen, Executive Office of Health and Human Services
FROM: Elizabeth Burke Bryant, Executive Director
DATE: November 1, 2022
RE: Public Comment, Medicaid State Plan and 1115 Waiver Extension

Rhode Island KIDS COUNT would like to submit the following comments on Rhode Island's Medicaid State Plan 1115 Waiver Extension request. Rhode Island KIDS COUNT commends the state for using the waiver extension as an opportunity to not just build on existing foundational aims of Rhode Island's Medicaid program, but to outline new and critically needed enhancements targeted at behavioral health, social determinants of health, and long-term services and supports for families in Rhode Island. We strongly support these priorities.

We urge EOHHS to adhere to the key value expressed in the extension application of elevating health equity and supporting choice by offering extensive, high-quality benefits. We agree with the priorities listed in the waiver to ensure all Rhode Islanders have access to high-quality services that promote overall health, **specifically, the promotion of continuums of care that deliver efficient, effective, and equitable services across the life course starting at birth.**

To best provide continuity of care for children we recommend that Rhode Island pursue providing continuous enrollment for children from birth through age 5 (all children under age 6) through its 1115 waiver. Several states (Oregon, Washington, and New Mexico) have included continuous eligibility for young children in their Medicaid section 1115 waiver extensions and Oregon has recently received approval from CMS. The Right from the Start Campaign, coordinated by Rhode Island KIDS COUNT, has identified this policy as a priority for the 2023 legislative session and FY24 state budget. Offering continuous eligibility from birth through age 5 (all children under age 6) will improve health coverage to children during the earliest years of life – when well-child check-ups are more frequent to monitor each child's progress in meeting developmental milestones and when young children experience an average of 6 to 9 routine illnesses per year. Without health coverage, early screenings and supports may not occur on a timely basis or may be missed altogether, resulting in children with routine illnesses being brought to the ER for diagnosis and treatment. **Continuous coverage through age 5 is essential to improve health quality measurement efforts which are critical to meaningful efforts to address racial disparities as mentioned in the waiver.**

Continuous eligibility for young children from birth through age 5:

- **Supports health equity:** Administrative “churn” is more likely to affect children of color. In August, a report from federal HHS projected that people of color and children will be more likely to lose Medicaid coverage for procedural reasons when the state of emergency and requirement for continuous eligibility ends.

- **Keeps children covered.** Gaps in coverage create gaps in care. Any gap in coverage exposes families to the possibility of large medical bills which can have severe economic consequences including bad credit and even bankruptcy.
- **Supports school readiness:** Primary care pediatricians and family practice doctors are the most likely to see young children and their families before they reach kindergarten. Kids who don't get the right care at the right time are less likely to enter school ready to learn. Untreated vision, hearing, mental or behavioral health issues can stand in the way of thriving in the classroom.

In addition, we support the following specific components in the 1115 waiver extension application:

- We strongly support the home stabilization improvements to expand the pool of qualified providers, expand the targeted population including families with children experiencing homelessness for home stabilization benefits, and add coverage for one-time transition costs.
- We support the goal to maximize opportunities to better support the state's place-based, community-engaged Health Equity Zones (HEZs). Supporting HEZ's will help the state more meaningfully address underlying social determinants of health that impact the health of Rhode Island families.
- We support extending managed care dental benefits to adults through the state's Rite Smiles program, which has increased access to important oral health care for Rhode Island's children.