

Early Intervention Policies and Procedures

5. Rhode Island System of Payments

The Rhode Island Early Intervention system of payments includes the use of public and private insurance. RI State Statute 27-18-64 (the Statute) requires private and public insurers that are based in Rhode Island that provide coverage for dependent children to cover the cost of Early Intervention services up to \$5000 per child per calendar year.

The Rhode Island Early Intervention system of payments does not include any family fees, co-payments or deductibles. Therefore there is no family payment system; no sliding or cost participation fees; no basis for determining fees; and no definitions regarding ability and inability to pay.

All functions and services identified on the IFSP are paid for through the use of private and public insurance.

The Rhode Island Early Intervention system will ensure that parents are not charged any out-of-pocket costs for any Part C services. Fees will not be charged for the services that a child is otherwise entitled to receive at no cost to the parents including:

- Implementation of the child find requirements
- Evaluation and assessment
- Service coordination
- Administrative and coordinative activities related to:
 - The development, review and evaluation of IFSPs
 - The implementation of procedural safeguards
- All Early intervention services authorized on the IFSP, including any co-payments or deductibles related to these services.

The Rhode Island Early Intervention system does not charge parents any fees, copayments or deductibles therefore the inability of the parents to pay for services will not result in the delay or denial of services to the child or the child's family; families will not be charged any more than the actual cost of an Early Intervention service; and parents with public insurance or benefits or private insurance will not be charged disproportionately more than those who do not.

No fees are charged to parents including a fee for failure to provide income information

The only cost parents are responsible for are the cost of their health insurance premiums.

No services that a child is entitled to receive are delayed or denied because of disputes between agencies regarding financial or other responsibilities

All Part C services on the IFSP are available to the child and family whether or not consent to use insurance or Medicaid is required or provided.

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Private Insurance

- **Parents with private individual and group insurance policies from employers located in Rhode Island** are protected by the RI Statute 27-18-64 and will not incur other potential long term costs, such as the loss of benefits because of annual or lifetime health insurance coverage caps under the insurance policy
- **Parents with health benefit plans from employers located in Rhode Island which are “self funded” and parents with private insurance or health benefit plans which are “self funded” from employers not located in Rhode Island** are exempt from the RI Statute 27-18-64 and may incur other potential long term costs, such as the loss of benefits because of annual or lifetime health insurance coverage caps under the insurance policy.
- The Rhode Island Statute does not protect parents with private insurance or health benefit plans from any increases in their premiums or discontinuation of their insurance coverage.
- EI providers will obtain parental consent to use insurance from all parents who have private insurance initially and when there is an increase in services (in frequency, length, duration and intensity). The parent will also be provided with the System of Payments Policies , and Written Notice Related to Private Insurance and Medicaid each time consent is requested.

Medicaid

The use of Medicaid will not:

- Decrease available lifetime coverage or any other insured benefit for the child or parent, or
- Result in the child’s parents paying for services that would otherwise be covered by public benefits or insurance, or
- Result in any increase in premiums or cancellation of public benefits or insurance for the child or parent, or
- Risk the loss of eligibility for the child or the child’s parents for home and community-based waivers based on total health-related cost.
- Parents are not required to enroll in public benefits or insurance in order to receive Part C services
- When a family has both private insurance and Medicaid, state Medicaid regulations require the use of private insurance as the primary insurance.
- OHHS is the same agency which administers Part C and Medicaid and parental consent is not required from parents already enrolled in Medicaid. EI providers will provide parents enrolled in Medicaid with the System of Payments Policies , and Written Notice Related to Private Insurance and Medicaid at Intake.

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Although in Rhode Island there are no fees charged to families, families have the right to contest a fee via dispute options which include:

- Participation in mediation;
- Requesting a due process hearing; or
- Filing a state complaint.

Families will be notified of these rights in their copy of *the Rhode Island System of Payments Policies*.

EI providers will provide all parents with the System of Payments Policies and *Written Notice Related to Private Insurance and Medicaid* at Intake.

Part C funds will be used as the payor of last resort and may be used to pay for costs of deductibles co-payments and to prevent a delay in the timely provision of Early Intervention services, pending reimbursement from the insurance provider that has ultimate responsibility for the payment.