

November 21, 2025

Rhode Island Executive Office of Health and Human Services (EOHHS)
3 West Road
Cranston, RI 02920

VIA ELECTRONIC MAIL – OHHS.Policy@ohhs.ri.gov

Re: 1115 Waiver Annual Public Forum Comment

To the Executive Office of Health and Human Services:

Thank you for the opportunity to comment on the state's 1115 Waiver during this annual public comment period.

[Legal Key Partnership for Health and Justice](http://www.legalkeypartnership.org) (Legal Key)'s mission is to create access to legal knowledge for health and social service sectors and empower those communities to use legal problem-solving to improve wellbeing. Through education, workforce consultation support, public resource development, and social care program design, Legal Key impacts systems, care professionals, and the individuals they serve. Formerly called MLPB, Legal Key is credited as the first medical-legal partnership in the country and today partners with health and social care systems in Rhode Island and Massachusetts.

Legal Key helps partners address families' most basic health-harming legal needs including housing, income support, personal and family safety, and education. Legal Key has the pleasure of working with a wide range of Rhode Island health and social care teams, providing training and consultative services to the RI Department of Health's Family Visiting Program, Blackstone Valley Community Health Center, and Hasbro Children's Hospital.

We submit this comment in part to share our appreciation of the work RI Medicaid does to provide health insurance coverage for nearly one-third of Rhode Islanders. Rhode Island's Medicaid investments and innovations have led to better health care access that in turn has led to improved health outcomes. In 2025, the Commonwealth Fund ranked Rhode Island as fourth in the nation for [access to health care and health system performance](#). Coverage extension now includes Community Health Workers, Doula care, home and community-based services, and home stabilization services. Commitment to this broad spectrum of health-related services increases the way people can reliably access the right health care, in the right place, and at the right time, while also supporting patients with the social supports they need to improve health. All of this is good for people and the healthcare system and budget.

Decades of investment in multi-disciplinary healthcare teams, here in RI and across the country, has demonstrated that this approach results in better community and individual health outcomes. We applaud RI Medicaid's investment in funding work across healthcare disciplines, as done through recent legislation and corresponding State Plan Amendment. This interdisciplinary approach creates routinized communication pathways for healthcare providers, which breaks down the siloed care our Medicaid enrollees receive.

We want to particularly uplift RI EOHHS's groundbreaking 2022 decision to amend its 1115 Waiver to incorporate Community Health Workers (CHWs) into interdisciplinary care teams by permitting some of their activities to be reimbursed by Medicaid dollars. Community Health Workers are essential to address adverse social determinants of health for many Rhode Islanders. CHWs are well situated to provide critical support that address patients' health-related social needs, such as transportation, nutrition, income, and housing insecurity because they have the time, training, and patient rapport.

As members of multidisciplinary healthcare teams ourselves, we know based on our work with health care teams. It is also reflected in the evidence. Research shows that CHWs' unique community-based approach has improved health outcomes for [specific diseases](#), [reducing emergency department utilization](#), [reducing caregiving stress](#), [improving patient health literacy](#), and [saving Medicaid dollars](#). A [2024 evaluation by the Rhode Island Department of Health](#) study of the impact of specialty-trained CHWs on patients with cardiovascular disease (CVD) and diabetes mellitus (DM) found that patients who received support from CHWs with specialized training in CVD and DM showed increased confidence in managing their chronic conditions.

Despite this evidence, RI EOHHS in May 2025 took steps to restrict the ways in which CHWs can be reimbursed. The new rules create limitations on who can be a CHW, how CHWs can conduct their work and create new referral burdens for other members of a CHW's interdisciplinary team. Reducing payment for the interdisciplinary team members who address health-related social needs will shrink the CHW workforce and diminish the State's overall capacity to support and improve Rhode Islander's health. We know that doctors, physicians' assistances, nurse practitioners, therapists do not have the time to do both the work of medicine and HRSN care. What our state will be left with is a return to a system of cold hand-offs to resource-strapped community-based organizations — a regressive policy action that will lead to poor health outcomes and increased healthcare costs.

We encourage RI Medicaid to continue its support of Community Health Workers care management, navigators, and other non-healthcare-provider members of interdisciplinary healthcare teams. It is important that RI Medicaid ensure that healthcare teams remain multidisciplinary and can access outside resources to support the optimal health of enrollees.

In conclusion, Legal Key writes to generally support the important work the Rhode Island Medicaid program has done to support enrollees' ability to attain their optimal health. We encourage RI Medicaid to continue to look for ways to support interdisciplinary teams through robust and continued reimbursement for CHWs critical work to patient improve patient health.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Copperman", with a long horizontal flourish extending to the right.

Amy Copperman, Esq.
Executive Director

A handwritten signature in black ink, appearing to read "Jeannine Casselman", written in a cursive style.

Jeannine Casselman, Esq.
Law & Policy Director

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