



*Rhode Island Office of the Health Insurance Commissioner & Medicaid Program Guidance
for Timely Access to Preventive Care Visits 2020-2022*

May 26, 2020

Background

The Office of the Health Insurance Commissioner (OHIC) and the Executive Office of Health and Human Services (EOHHS) issue this guidance to supplement and further clarify previous guidance: *COVID-19 TeleHealth Delivery Policy and Procedure Guidance for RI Medicaid*¹; *Rhode Island Office of the Health Insurance Commissioner & Medicaid Program Instructions During the COVID-19 State of Emergency*²; and *Rhode Island Office of the Health Insurance Commissioner & Medicaid Program Guidance for Preventive Care Visits During the COVID-19 State of Emergency*.³ These guidance documents were issued to support implementation of Governor Raimondo's March 18, 2020 Executive Order *Fourth Supplemental Emergency Declaration—Expanding Access to Telemedicine Services*.⁴ The purpose of this guidance is to provide further direction on the delivery of and payment for preventive medicine services to ensure that providers are able to continue to provide timely medically necessary and clinically appropriate care to their patients as the COVID-19 crisis evolves.

Policy

On May 7, 2020, OHIC and EOHHS issued joint guidance on preventive visits⁵ that directed all Medicaid Managed Care Organizations (MCOs) and all Commercial Health Insurers (Carriers) to revise their policies to allow for the components of the preventive visit to be conducted on two separate dates of service for pediatric and adult patients. The May 7 guidance on preventive care gives providers necessary flexibility to perform components of the exam that are clinically appropriate to be performed by telemedicine and to perform the physical requirements of the preventive medicine exam (e.g. immunizations, vital signs, vision screening, hearing screening) during a subsequent, brief in-person office visit.

¹ Medicaid Temporary Telehealth Guidance: http://www.eohhs.ri.gov/Portals/0/Uploads/Documents/1115Waiver/COVID_2020/COVID-19%20Memo%20for%20RI%20Medicaid%20Telehealth_042420vF.pdf

² OHIC Temporary Telemedicine Instructions: <http://www.ohic.ri.gov/documents/2020/March/COVID/OHIC%20Bulletin%202020-01%20-%20Adopted%20-%20with%20supporting%20documents.pdf>

³ OHIC & EOHHS Guidance on Preventive Visits: <http://www.ohic.ri.gov/documents/2020/May/FINAL%20OHIC-EOHHS%20Telemedicine%20Preventive%20Care%20Guidance%202020%2005%2007.pdf>

⁴ Executive Order: <https://governor.ri.gov/documents/orders/Executive-Order-20-06.pdf>

⁵ OHIC & EOHHS Guidance on Preventive Visits: <http://www.ohic.ri.gov/documents/2020/May/FINAL%20OHIC-EOHHS%20Telemedicine%20Preventive%20Care%20Guidance%202020%2005%2007.pdf>



The COVID-19 pandemic has significantly disrupted access to timely preventive care visits. Annual preventive exams include important health services, such as physical examinations, cancer screenings, laboratory tests, behavioral health screenings, and immunizations. As COVID-19 restrictions lift, it will be important for patients to reschedule any visits they had to delay during the crisis. Consequently, many of these visits will need to take place in the summer and fall of 2020.

Some carriers and MCOs maintain policies that allow for only “one preventive visit every 365 days”, versus “one preventive visit in a calendar/plan year.” With such policies in place, many patients will be limited to getting their future well visits only in the summer and fall. This will perpetuate a disrupted schedule for patients and providers, particularly with regard to immunization schedules. It will also lead to inconsistent practice volume and staffing needs, with a very low volume of wellness visits in the spring and a burdensome volume in the summer and fall. In order to return to a more timely and balanced schedule of wellness visits, EOHHS and OHIC are directing all MCOs and all Carriers to amend any existing well visit limitations from “one preventive visit every 365 days” to “one preventive visit in a calendar year/plan year” for the years 2020-2022.

MCOs may submit a request to EOHHS and Carriers may submit a request to OHIC to fulfill the purpose of this guidance using an alternative implementation approach.