



Rhode Island Executive Office of Health and Human Services
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May 5, 2026

The Honorable Louis P. DiPalma, Chairman
Senate Committee on Finance
Room 211 – State House
Providence, RI 02903

RE: 2026 – S 2241 – An Act Relating to Human Services – Medical Assistance

Dear Chairman DiPalma:

The Executive Office of Health and Human Services would like to share information as well as concerns relating to **S 2241**. The bill seeks to allow Medicaid reimbursement for graduate student interns in a mental health discipline who are working under a supervisory protocol.

This bill would impact Medicaid fee-for-service and managed care mental health billing providers and clinicians. Currently, the Rhode Island Medicaid Program requires a supervisor to submit claims for a graduate student intern's work under the supervisor's Medicaid national provider identifier (NPI). Additional funding would be needed in the Central Management budget for MMIS re-design to effectuate the enrollment steps and mental health billing codes affected to allow graduate student interns to bill. **For example, as drafted, the bill would require a split billing process to compensate both the graduate intern and the supervising organization (not the supervising clinician)**, which will require system changes. In addition, EOHHS would need legislative authority to seek a state plan amendment to recognize this additional provider type and establish new codes.

Furthermore, EOHHS/Medicaid is concerned that the bill could lead to confusion amongst the general provider community regarding the proposed changes to existing policy, applicability across provider types and payors, and the precise definition of "mental health professional discipline." The expansion of billing to individuals who are not independently licensed or certified raises program integrity concerns. CMS, through the Medicare program, has strict requirements for supervisory protocols, especially for trainees, and does not permit graduate interns to bill Medicare independently. Like Rhode Island Medicaid, Medicare recognizes services rendered by a graduate intern under the supervisor's license, NPI, and enrollment.

EOHHS would welcome any discussion about **S 2241** and staff are available to assist with any questions or concerns.

Sincerely,

John J. Bonin

Medicaid Program Deputy Director, Executive Office of Health and Human Services

Cc: Honorable Members of the Senate Committee on Finance
Honorable Alana M. DiMario
Kristin Silvia, Deputy Chief of Staff and Director of Legislation