



CMS Informational Bulletin: Coverage of Housing-Related Activities and Services for Individuals with Disabilities



Overview

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Agenda

- Overview and Purpose of Informational Bulletin
- Describing housing-related services and activities for individuals needing LTSS
- Medicaid authorities and demonstration programs supporting housing-related services
- Assisting states and next steps

CMS Informational Bulletin:

Coverage of Housing-Related Activities and Services for Individuals with Disabilities

- Center for Medicaid and CHIP Services (CMS/CMCS)
 - Published June 26, 2015
- Worked with Federal Partners (HUD, SAMHSA, ASPE and ACL)
- Goal: To promote community integration of individuals needing Long Term Services & Supports (LTSS) by:
 - Assisting states in designing Medicaid benefits
 - Clarifying which housing-related services are reimbursable under Medicaid
 - Listing relevant authorities

Details of the Informational Bulletin

Disclaimer:

“Consistent with statute, CMS does not provide Federal Financial Participation (FFP) for room and board in home and community based services.”

Note: There are 2 technical exceptions under 1915(c) waivers: (1) for temporary short-term out of home respite services and (2) for unrelated live-in caregivers. Payment for the room and board for the unrelated live-in caregiver is not available if the participant lives in the caregiver’s home or in the residence owned or leased by the provider of waiver services (see CIB, p. 5).

What are Housing-Related Services?

- Based on successes in the Money Follows the Person (MFP) program and the Real Choice Systems Change grants, the Informational Bulletin describes certain housing-related services for individuals needing LTSS in the community, particularly for those transitioning to the community from institutional LTSS settings:
 1. Individual Housing Transition Services
 2. Individual Housing & Tenancy Sustaining Services
 3. State-level Housing Related Collaborative Activities

1. Individual Housing Transition Services

- Services that support an individual's ability to prepare for and transition to housing, such as:
 - Screening and housing assessment for an individuals' preferences and barriers
 - Developing an individual housing support plan: identifying goals, addressing barriers, establishing approaches to meet their goals, including identifying available services/resources
 - Assisting with housing application and search processes
 - Identifying resources for modifications; one-time move-in needs
 - Assisting in arranging for and supporting details of the move
 - Developing housing support crisis plan

2. Individual Housing & Tenancy Sustaining Services

- Services to support individuals to maintain tenancy once housing is secured, such as:
 - Early intervention for behaviors that might jeopardize housing, e.g., late rent payment; lease violations
 - Training on roles, responsibilities, rights of tenant and landlord
 - Coaching on relationship-building with landlords, managers, and neighbors, and assisting in dispute resolution
 - Linking with community resources to prevent eviction
 - Assisting with housing recertification process
 - Coordinating with the individual to review, update, and modify their housing support and crisis plans
 - On-going training and support in household management, etc.

3. State-level Housing Related Collaborative Activities

- Activities that support collaborative efforts across public agencies and the private sector that assist a state in identifying and securing housing resources, such as:
 - Developing formal/informal collaborations between services and housing agencies
 - Participating in planning processes of housing agencies, for example, by providing demographic, housing need, and other relevant data
 - Working with housing partners to create and identify housing options, such as coordinating housing locator systems; developing services data and tracking systems to include housing.

Medicaid Authorities and Demonstration Projects

- State options under Medicaid and demo programs for covering housing-related services and activities that promote community integration for individuals needing LTSS, particularly individuals transitioning from institutions, include:
 - 1915(c) HBCS Waivers
 - 1915(i) HCBS State Plan Optional Benefit
 - 1915(k) Community First Choice State Plan Optional Benefit
 - 1915(b) Waivers
 - 1905(a) State Plan Services
 - Section 1115 Research and Demonstration Programs
 - Money Follows the Person Rebalancing Demonstration

1915(c) HCBS Waivers

- Case management activity can reimburse for housing transition and tenancy sustaining services, such as:
 - Assessing the participant’s housing needs and presenting options
 - Assisting in securing housing, including the completion of housing applications
 - Searching for housing, and communicating with landlords
 - Coordinating the move
 - Providing training on how to be a good tenant, and establishing procedures and contacts to retain housing.
- Environmental modifications necessary for accessibility
- For individuals transitioning from an institution, Community Transition Services such as:
 - Security/utility deposits; essential household furnishings and moving expenses; services necessary for the individual’s health and safety

** Note: See CIB for precise descriptions and additional details

1915(i) HCBS State Plan Optional Benefit

- Can reimburse for housing transition and tenancy sustaining services, similar to 1915(c) waiver noted above, such as:
 - Assessing the participant’s housing needs and presenting options
 - Assisting in securing housing, including the completion of housing applications
 - Searching for housing, communicating with landlords, coordinating the move
 - Providing training, and establishing procedures and contacts to retain housing.
- Environmental modifications necessary for accessibility
- For individuals transitioning from an institution, Community Transition Services such as:
 - Security/utility deposits; essential household furnishings and moving expenses; services necessary for the individual’s health and safety
- Can serve adults w/behavioral health issues; others not meeting institutional level of care. Cannot waive state wideness, or limit numbers served.

** Note: See CIB for precise descriptions and additional details

1915(k) Community First Choice SP Opt. Bene.

- Reimburses for person-centered home and community based attendant services and supports in a home and community based setting, such as:
 - Instrumental activities of daily living (IADLs), and health-related tasks
 - Acquisition, maintenance, and enhancement of skills for the individual to accomplish ADLs, IADLs, and health-related tasks
 - Backup systems or mechanisms to ensure continuity of services and supports;
- Permissible services and supports linked to an individual's assessed need in their person-centered plan, such as:
 - Transition costs from an institution to the community, and/or expenditures that increase an individual's independence
 - One-time expenses to transition to community housing, such as: security deposits for an apartment or utilities, purchasing bedding and basic kitchen supplies, first month's rent

** Note: See CIB for precise descriptions and additional details

1915(b) Waivers

- States may use 1915(b) waivers to reimburse housing-related services under a managed care delivery system
 - For services that are otherwise coverable under state plan and waiver programs or are medical, health-related or remedial in nature
- 1915(b)(3) authority permits states to use the savings from services covered through its 1915(b) waiver to provide additional services to waiver enrollees, such as housing-related services specified in this bulletin for individuals to identify, transition to, and sustain their housing.

** Note: See CIB for precise descriptions and additional details

1905(a) State Plan Services

- Targeted case management (TCM) services provided under the Medicaid State Plan may be beneficial for individuals transitioning from institutions and/or trying to obtain or maintain their community housing arrangement.
- TCM services are furnished to assist individuals in gaining access to needed medical, social, educational, and other services.
 - TCM is a specific service under the state plan that is targeted to specific populations, as determined by the state.
- As part of identifying the total needs of an eligible individual, targeted case management can include:
 - Linking the individual to needed housing resources
 - Activities to help an individual find housing
 - Assisting with identifying resources to support the participant to maintain housing during a crisis.

** Note: See CIB for precise descriptions and additional details

Demonstration Programs

- Section 1115 R&D programs give states flexibility to innovate service delivery systems, including housing-related services, such as:
 - Helping individuals in the community to problem solve, advocate with landlords, access community resources to assist with back rent, and assist individuals to complete forms for subsidized housing.
 - Assisting people leaving institutions with locating housing, completing forms for subsidies, moving, and household set ups.
- Money Follows the Person programs may offer housing-related services to individuals transitioning to community based settings, such as:
 - Hiring housing specialists to provide services and activities
 - State-level housing-related collaborative activities to create, identify and secure affordable, accessible, rental housing resources
 - Collaborating with housing organizations to assist transitioning individuals in locating, applying for and moving into housing, housing stabilization, tenancy supports and services to assist in remaining in their housing.

** Note: See CIB for precise descriptions and additional details

Federal Policy Across Multiple Agencies to Promote Community Integration

- Legislative Changes to HUD Section 811 Program (January 2011)
- DOJ Statement on Community Integration (June 2011)
- HUD Olmstead Guidance, including “Olmstead Preference” (June 2013)
- CMS Home and Community Based Services Final Rule (January 2014)
- CMS Informational Bulletin on Housing-related Activities and Services (June 2015)
- SAMHSA Olmstead and Homeless Policy Academies

Assisting States and Next Steps

- State examples provided in Informational Bulletin
- Additional information and technical assistance available from DCST
- Collaborations between HUD, HHS, and CMS continue at the Central Office level
 - State level thru Medicaid-housing agencies partnerships under HUD's new grants for Sec. 811 Project Rental Assistance for housing non-elderly persons with disabilities awarded in 25 states
- Will build on this Informational Bulletin to provide additional information regarding other populations and services
- Innovation Accelerator Program – Community Integration Long Term-Service – Housing Track

Additional Questions/Information

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To access the Informational Bulletin, *06/26/2015: CIB: Coverage of Housing-Related Activities and Services for Individuals with Disabilities*
Go to Medicaid.gov at:
<http://www.medicaid.gov/Federal-Policy-Guidance/Federal-Policy-Guidance.html>

For reference materials and additional information:
MFP Technical Assistance Website: <http://mfp-tac.com>
E-Mail: mfp-ta@neweditions.net

