Corporation for Supportive Housing

POLICY BRIEF



SUMMARY OF STATE ACTIONS Medicaid & Housing Services

Updated Summer, 2024

INTRODUCTION

States recognize the importance of addressing Housing Related Services (HRS) and Health Related Social Needs (HRSN) to improve health equity and health outcomes while simultaneously reducing Medicaid spending. As a result, a growing number of states have approved Medicaid waivers and State Plan Amendments (SPAs) that cover HRS and other supports to address HRSN. These programs also include the ability to access Medicaid funding for supportive housing services and gives states the potential to scale the evidenced-based model of supportive housing. CSH is also advocating for states to adopt six additional strategies to ensure that these new services lead to the creation of more supportive housing. The first and most important of these strategies is to align affordable housing with HRS at the systems level.

States are using Housing Related Services (HRS) to scale supportive housing models, so that states can address chronic shortages of supportive housing and overcome racial disparities driven by SDOH needs of Medicaid recipients. New large-scale research is showing the risk of premature death for those experiencing homelessness.³ Systemic and structural racism contribute to multiple barriers to housing for Black, Indigenous and People of Color (BIPOC) communities in relation to both health and housing. BIPOC communities are overrepresented among people experiencing homelessness and housing instability, families involved with the child welfare system, people impacted by the carceral/justice system, and those living in congregate care settings. To promote greater health equity, communities must grow supportive housing capacity and make access to housing and services more equitable. States are also looking to expand supportive housing to serve new people and

 $[\]frac{1}{https://www.nationalacademies.org/news/2018/07/permanent-supportive-housing-holds-potential-for-improving-health-of-people-experiencing-homelessness-but-further-research-on-effectiveness-is-needed-including-studies-on-housing-sensitive-health-conditions$

 $^{^2\,\}underline{\text{Using Medicaid's Housing Related Services (HRS) to Create New Supportive Housing - CSH}}\\$

³ The first national calculation of mortality of the US homeless population | CEPR

populations and ensure that people live in the most community-integrated setting possible to comply with the Olmstead decision.⁴

Approved Medicaid 1115 waivers in several states now cover recuperative care (or what the homeless sector calls Medical Respite) and six months of housing assistance. For example, California's MediCal Transformation provides Managed Care Plans (MCPs) the option to cover 90 days of recuperative care and up to six months of post-hospitalization housing. Arizona, Illinois, Massachusetts, New York, Oregon, and Washington are also approved for up to six months of housing for broader populations, commonly including those experiencing or at risk of homelessness, those leaving institutional care or congregate settings, and families with child welfare involvement. Given the nation's affordable housing crisis, linking those persons to long-term housing options such as permanent supportive housing or other long-term affordable options will be crucial to this demonstration model's success. By CSH's analysis, 27 states and Washington DC have been approved to cover HRS via their state Medicaid plan. Our map can help you find where your state is in this process.⁵ CSH has also summarized key administrative details for states such as provider types, recommended taxonomy codes⁶, Healthcare Common Procedure Coding System (HCPCS) codes⁷ and payment models in a searchable web site.⁸

Increasingly, states are requiring screening for Health-Related Social Needs including homelessness, housing instability and food insecurity. States are developing networks of providers who can address the challenges faced by Medicaid recipients in these areas. The screening will produce new and better data around what HRSN needs are not being met and the ability of communities to address those needs. While health care organizations will use this information to make referrals for assistance, local systems, in the current climate, generally do not have the capacity to assist all who need help particularly with a significant new source of referrals. The supportive housing industry is watching closely and hopes to use that data to better make the case for needed new affordable and supportive housing resources.

The Centers for Medicare & Medicaid Services (CMS) views HRS and HRSN services as part of the state's Home and Community Based Services (HCBS) program so states are integrating these new services into existing programs and systems. State Waiver approvals include a number of administrative requirements familiar to HCBS programs including Settings Rule

⁴ Community Living and Olmstead | HHS.gov

⁵ https://www.csh.org/health/medicaid-waivers-map/

⁶ Find Your Taxonomy Code | CMS

⁷ <u>UMLS Metathesaurus - HCPCS (HCPCS - Healthcare Common Procedure Coding System) - Synopsis (nih.gov)</u>

⁸ Medicaid and Housing Related Services - CSH

compliance, Person-Centered Plans and Conflict of Interest requirements. Twenty-two states have Managed Long-Term Services and Supports (LTSS) programs, and states may choose to administer the program through a Managed Care delivery system with providers billing Managed Care Organizations (MCOs) for these services. CSH has also seen value in a Third-Party Administrator (TPA) delivery system in which one entity is responsible for the traditional MCO role, but is also tasked with onboarding nontraditional Medicaid providers, commonly called Community Based Organizations (CBOs). For the approved HRSN waivers, states are also, in some cases, not requiring Medicaid claims but accepting invoices, though the information reported remains similar if not identical to a Medicaid claim. In any case, supportive housing providers will need startup funding AND technical assistance to make this shift with distinctive administrative implications for agencies. States with HRSN waivers can offer this infrastructure funding in 4 categories: Technology, Business Practice, Workforce Development and Outreach, Education and Convening.

The table on the following pages highlights actions the states and the District of Columbia have taken to improve service delivery and financing of Housing Related Services (HRS) and are now commonly delivered by supportive housing providers.

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⁹ <u>Using Home and Community Based Services for Supportive Housing - CSH</u>

SUMMARY OF STATE ACTIVITY

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Arizona	Housing and Health Opportunities (H2O)	1115 Waiver	People experiencing homelessness, those leaving institutions or congregate care and child welfare involved families.	Pre and Post tenancy services, 6 months housing costs including enhanced shelter and outreach	The state is using a Third-Party Administrator.	State Planning Post CMS approval Health related Social Needs (HRSN) Waiver approved October 14, 2022. GO LIVE date is 10/1/2024. Implementation Plan Services Protocol
California	MediCal Transformation	1115 waiver and 1915(b) State Plan Amendment	People experiencing homelessness is one of many priority populations	Pre and Post tenancy services, 6 months housing costs	State using In Lieu of Services (ILOS) in which MCPs decide what services to offer and to whom.	Operating The waiver was approved December, 2021 with a January 1, 2022, start date. Early outcomes reporting.
Colorado	Statewide Supportive Housing Expansion (SWSHE)	ARPA HCBS Plan for services and HUD Emergency Housing Vouchers (EHV) for housing subsidies.	Persons experiencing homelessness, multiple disabling conditions, and high health/crisis system utilization.	Pre and Post Tenancy Support Services	The state is transitioning to Medicaid and has created Community Services Provider, Provider Type 89, Code 208	Conditional Approval Initiative 3.07 Wrap around services including Peer Supports, for Members with Complex Needs

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Connecticut	The CT Housing Engagement and Support Services (CHESS) Initiative	1915 (i) State Plan Amendme nt (SPA)	Homeless and higher health care utilization than to be expected based on diagnosis	Pre and post tenancy support services	Administered by Carelon Behavioral Health of Connecticut (ctbhp.com)	Operating State Initiative website CMS approved SPA
District of Columbia	Housing Supportive Services dhs (dc.gov), including Housing Stabilization Services and Housing Navigation Services	1915(i) SPA	Homeless as identified by the city's Coordinated Entry System	Pre and post tenancy support services	Assessment for the services is integrated into the Coordinated Entry process. Providers are paid by DC Medicaid on a Per Member, Per Month (PMPM) basis. Rate raised to \$770.31 in FY 2023.	Operating SPA approved March 25, 2022

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Florida	Housing Assistance Waiver Pilot Program in HHS regions C and D.	1115 Waiver Amendme nt	Homelessness	Pre and post tenancy services	Administered by the Managed Care Organizations (MCOs) in the pilot regions. State Snapshot of MCOs	Operating Implementation active in regions C and D i the central part of the state. New waiver amendment requests expansion to regions A and B.
Hawaii	Community Integration Services (CIS)	1115 Waiver	Individuals with a behavioral health, physical illness, or substance use diagnosis and are chronically homeless.	Pre and Post tenancy Services	Administered by state's Medicaid Managed Care Organizations (MCOs). State MCO listing State modifying implementation guidelines to improve access for target population.	Waiver approved by CMS October 31, 2018. State Program Web page
Illinois	Health Related Social Needs including Housing Interventions	1115 waiver	Individuals who are considered high cost or high risk including those with Behavioral Health needs, a chronic physical condition or pregnant.	Housing Supports including: Housing Transition and Navigation, Pre-Tenancy navigation, One time transition costs and Tenancy Sustaining Services	Administered by the state's Medicaid Managed Care Organizations (MCOs). State MCO listing	State Planning post CMS approval Waiver approved 7/2/2024. CSH working with the state on rate development for Supportive Housing Services

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Louisiana	Permanent Supportive Housing (PSH) Initiative	State Plan Services	Low-income populations with disabilities.	Pre and post tenancy services	State plan process integrated across housing and services sectors.	Operating State PSH Website
Maryland	Assistance in Community Integration (ACIS) program	1115 Waiver	Homeless or at risk, institution or high risk of institutional placement AND 4 or more hospital visits in a year & 2+ chronic conditions.	Pre and post tenancy services	Administered by the counties who are responsible to align with housing resources.	State ACIS Project Website State Report on program FY25 state budget approved the program to go state wide.

	Health	1115 MassHealt	Homeless individuals	Administered by state's MCOs	Operating
	Related	h Demonstra	2 TDD by soch	2 Administered by	For CSP-HI- Code-
	Social Needs	<u>Demonstra</u> tion	TBD by each ACO and their	2. Administered by MCOs and ACOs	H2016 Modifier HK and rate is a per diem of rate
	1. Community	("Waiver")	community	to members of	of \$27.72
	Supports Program for	Mass.gov	partners.	their choosing to reduce costs and	CSPECH Cost Savings
	Homeless		MA ACO and	improve health	Report- 2017
Massachusetts	Individuals (CSP-HI)		MCO listing.		New Waiver approved
	O Flavible				9/28/2022.
	Flexible Services to				DSRIP HRSN Protocol
	evolve to Health				Approved June, 2023
	Related				HRSN Integration Fund -
	Social Needs (HRSN)				Health Resources in Action (hria.org)
	services				Action (ma.org)

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State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
	Housing Assistance	1915 (i) SPA as of October 2023	Persons with serious mental illness, serious emotional disturbance and/or intellectual/develo pmental disabilities.		Services are a component of the state's Behavioral Health Transformation Plan. The benefit is offered through the Prepaid Inpatient Health Plans or PIHPs that manage community behavioral health provider network.	Operating CMS approved 1915(i) SPA
Michigan	SDOH In Lieu of Services	Via Managed Care Contracts	TBD by MCOs	TBD	Addressing SDOH needs including potentially Housing Related Services	MDHHS issues award recommendation for Michigan's Medicaid Health Plans

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Minnesota	Housing Stabilization Services	1915 (i) SPA	People with disabilities, homeless or housing unstable.	Pre and Post tenancy services	Benefit administered by MCOs, approved by the state. Housing Transition reimbursed at \$17.17 per 15-minute increment. The code is H2015 U8. Housing Sustaining reimbursed at \$17.17 per 15-minute increment. Code-H2015 U8/TS. ¹⁰	Operating Housing Stabilization Services
Montana	HEART Waiver (mt.gov)	1115 Waiver	People with behavioral health challenges who are experiencing homelessness or housing instability.	Pre and Post tenancy services.	TBD - Montana is one a few states that does not have Medicaid Managed Care	State Planning post CMS Approval The Waiver Ammendment was approved 2/26/2024.
Nevada	Housing Support Services	1915(i) SPA	TBD	TBD		Planning For a Medicaid funded Tenancy Support Services Benefit.

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¹⁰ Housing Stabilization Services (state.mn.us)

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New Hampshire	Housing Stabilization Services	1915(i) SPA, which is a Home and Community Based Services (HCBS) program	Homeless or at risk of homelessness and needing assistance for community living.	TBD Program capped at 50 people	Administration is TBD but the state's current Home and Community Based Services programs is administered by Managed Care	State Planning post CMS approval The State Plan Amendment is approved and the state is developing regulations to govern operations
New Jersey	Housing Transition and Tenancy Sustaining Services as part of a Health- Related Social Needs program	1115 Waiver	Persons with disabilities, formerly incarcerated, formerly homeless or at risk of homelessness, transitioning from institution and/or beneficiaries who are transitioning out of high-risk or unstable housing situations.	TBD	TBD	State Planning post CMS approval The HRSN 1115 waiver is approved as of 3/30/2023 and the state is developing regulations to govern operations.

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
New Mexico	Supportive Housing Units, including capital funds	1115 waiver	Those with Serious Mental Illness	Pre and post tenancy services	The services are administered by Managed Care	Program is called Linkages and provides state funded rental assistance with Medicaid services for those with Behavioral health Challenges Updated Centennial Care 2.0 waiver includes growing the program.
New York	Health Related Social Needs Waiver	1115 waiver	TBD by newly developed Social Care Networks or SCNs	Pre and post tenancy services. Homelessnes s, SMI and SUD are suggested priority populations.	Everyone is screened for HRSN needs and referred to an SCN who is charged with addressing needs. SCN contracts have not been awarded as of July 2024.	State Planning post CMS approval Waiver approved 1/9/2024.
North Carolina	Social Determinants of Health (SDOH) Initiatives can include Housing Support Services.	1115 Waiver	Three regions in the state, all rural, were awarded funding to operate Healthy Opportunities Pilots to offer SDOH services.	Services Definitions	Lead Pilot Entities (LPE) are operating as Community Care Hubs supporting CBOS administratively.	State Program Website Services Definitions and Fee Schedules updated March, 2023
North Dakota	Housing Support Services	1915 (i) SPA	People with behavioral health challenges who are experiencing homelessness and housing instability.	Pre and post tenancy services	Providers bill the state for the traditional Medicaid population or an MCO for those who are part of the Medicaid Expansion	Operating The state has an approved 1915(i) SPA. Services began on February 2, 2021.

			The rate is \$10.49 per 15-minute increment. The code is H2021 U4. ¹¹
			Enrollment and Service Delivery Report

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¹¹ 2023 1915i Fee Schedule.xlsx (nd.gov)

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Oregon	Health-related services can include housing services. Housing services are optional for Coordinated Care Organizations (CCOs) to fund. Health Related Social Needs (HRSN) services including Housing Support Services	1115 Waiver that creates Coordinate d Care Organizatio ns (CCOs)	The target population is not specified in the waiver. CCOs can choose to include services as an optional benefit under health-related services. People at risk of homelessness, those leaving institutions or congregate care and child welfare involved families. Services for those experiencing homelessness do not have a GO LIVE date set.	Pre and post tenancy services Rental Assistance Housing Transition Costs	Coordinated Care Organizations or CCOs are Oregon's community focused evolution of Managed Care. State working with CCOs to implement and TPA for individuals who are not CCO members	The state is working to incentivize CCOS to offer tenancy supports to pair with new housing-related resources that are coming online. State Health-Related Services Overview State Planning post CMS approval Housing Services GO LIVE, November 2024 for those at risk of Homelessness with serious mental illness. State submitted Implementation Plan in August 2023. Waiver approved 9/28/22

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Pennsylvania	1. Keystones of Health 2.Tenancy Support Services for intellectual or developmental disability/develop mental disability (IDD/DD) population	1. 1115 authority 2.1915 (i) SPA	Those already eligible for IDD waivers. The process remains the same as before the waiver.	Pre and Post Tenancy Services	 Via a Third Party <u>Administrator</u> Via Community Health Choices 	Operating The state has added tenancy support services to the menu of services for persons eligible for the IDD waiver. The state is negotiating with CMS on the 1115 waiver for HRSN services.
Rhode Island	Home Stabilization Services	1115 waiver	Persons with behavioral health or intellectual disabilities and those institutionalized or at risk of institutionalization	Home FIND and Home Stabilization Services	The per month rate per member is \$331.84 and the code is H0044.	Operating CMS approved waiver. State Project Website The state has created a Certification Standards and Provider Manual.
Texas	Supported Home Living	1915(i) SPA	Persons with serious mental illness.	Supported home living services that could be used in Supportive Housing		Operating CMS approved SPA on August 31, 2020

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Utah	Housing Related Services and Supports	1115 Waiver	Generally, has a Behavioral Health challenge and is homeless or at risk of homelessness.	Tenancy Support Services, Community Transition Services and Supportive Living Services	Services are authorized by state HRSS staff HCPCS Billing Code: T2024 – Tenancy Support Service - \$18.37 per 15 minutes HCPCS Billing Code: T2038 – Community Transition Services, 2 episodes per 5-year period per person up to \$2,000 per each occurrence HCPCS Billing Code: T2017 – Supportive Living Service - \$18.37 per 15 minutes	Waiver Approved 6/30/2022 State Housing Related Services and Supports (HRSS) web site Provider Manual- updated March, 2024
Vermont	Supportive Housing Assistance Pilot Program	1115 Waiver	Persons who are 18 and older and need assistance with at least one needs-based criteria and have one or more risk factors.			State Planning post CMS approval The state's 1115 Waiver was approved on June 28, 2022, and includes a PSH Pilot

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Vermont	Supportive Housing Assistance Pilot Program	1115 Waiver	Persons who are 18 and older and need assistance with at least one needs-based criteria and have one or more risk factors.			State Planning post CMS approval The state's 1115 Waiver was approved on June 28, 2022, and includes a PSH Pilot
Virginia	High Needs Support Benefit	1115 Waiver	State to develop target criteria that include health- related needs- based measures and risk factors			Planning CMS approved the waiver as of July 9, 2020. The state timeline for implementation is TBD. High Needs Support (virginia.gov)

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
The State of Washington	Foundational Community Supports (FCS) for supportive housing and supportive employment services.	1115 Waiver	People experiencing chronic homelessness, individuals with frequent or lengthy adult residential care stays, individuals with frequent turnover of in-home caregivers, and those at highest risk for expensive care and adverse outcomes.	Pre and Post tenancy services and supported employment services	The state is using a Third-Party Administrator to simplify administrative processes. Wellpoint (formerly Amerigroup) Provider Manual Using Billing Codes H0043 Community Support services: daily rate of \$112 with a benefit limitation of 30 days over 180 days.	The waiver was approved and implemented as of January 1, 2018. State Program Website
	Continuation of the FCS program described above AND expansion of Health-Related Social Needs Services including housing	1115 Waiver Renewal	Populations include chronic homeless, institutionalized or at risk of institutionalization	A variety of Health-Related Social Needs services including pre and post tenancy services, housing transitional costs and rental assistance	State will continue to use a TPA for FCS, as well as work with their Accountable Communities of Health (ACHs) to roll out the services via Community Based Organizations or CBOs	State Planning post CMS approval Waiver renewal approved June 30, 2023

State/City	Program Name	Medicaid Authority	Target Population includes:	Services Include	Key Administrative Details	Status
Wisconsin	CHIP Housing Support Initiative	Children's Health Insurance Program (CHIP)	Low-income families with children 18 years and younger and individuals who are pregnant.	-Housing Consultation -Transition Supports -Sustaining Supports -Relocation Supports	State is granting funds to 8 homeless assistance providers in all four of Wisconsin's CoCs. (add website) https://www.dhs.wisconsin.gov/medicaid/housing-supports.htm	Operating Start date was May 21, 2023
	Housing Support Services	1915(i) SPA	Medicaid beneficiaries with Behavioral Health needs, who are experiencing homelessness or at imminent risk of homelessness	-Housing Consultation -Transition Supports -Sustaining Supports -Relocation Supports		Negotiating with CMS State Housing Supports web site.

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CSH (Corporation for Supportive Housing) advances affordable and accessible housing aligned with services by advocating for effective policies and funding, equitably investing in communities, and strengthening the supportive housing field. Since our founding in 1991, CSH has been the only national nonprofit intermediary focused solely on increasing the availability of supportive housing. Over the course of our work, we have created more than 467,600 units of affordable and supportive housing and distributed more than \$1.5 billion in loans and grants. Our workforce is central to accomplishing this work. We employ approximately 170 people across 30 states and U.S. Territories. As an intermediary, we do not directly develop or operate housing but center our approach on collaboration with a wide range of people, partners, and sectors. For more information, visit www.csh.org.

