



COLORADO

Department of Health Care
Policy & Financing

303 E. 17th Avenue
Denver, CO 80203

Medicaid Housing and Nutrition Supports: Expedited Waiver Plan

May 2024

Summary

In order to expand coverage of services that support whole-person health and wellness through housing and nutrition supports, the Department of Health Care Policy and Financing (HCPF) is pursuing the submission of a Health-Related Social Needs (HRSN) 1115 Demonstration Waiver in Summer 2024. This requires HCPF to work quickly and closely with other state agencies, community partners, and the Governor's Office to submit a proposal to the federal government requesting federal funding support for these housing and nutrition programs, as authorized by [House Bill 24-1322 "Medicaid Coverage Housing & Nutrition Services"](#) (HB24-1322).

Federal guidance has created a narrow pathway for states to follow for accelerated approvals, based on a prescriptive set of services that have been approved in other states. HCPF and other state agencies have determined that requesting approval for programs that a) fit this guidance exactly; b) is already in operations in the state using state-only funds; and c) have existing community support will be prioritized for the first phase of the proposal. This ensures that established programs are able to move along a priority timeline. Additional programs will be considered over the next few years including time for considerable planning, partnership, community feedback, and testing. The housing and nutrition support services outlined in this fact sheet meet the criteria for an expedited timeline; we aim to submit a draft for public comment in June and to submit a final draft to our federal partner by August 2024. Look for opportunities to engage by subscribing to the [HRSN newsletter](#) and visiting the [HRSN website](#).

Overview of the Health-Related Social Needs Amendment and Policy

What is this new amendment about?

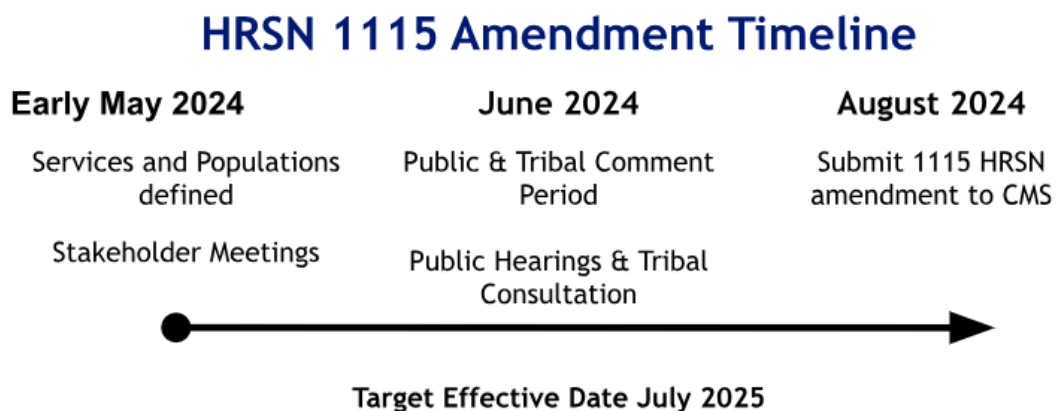
- HCPF is pursuing an amendment to Colorado's existing [1115 SUD Demonstration Waiver](#) to expand Medicaid coverage of health related social needs (HRSN) services for certain populations with a focus on housing and nutrition supports. While the state is seeking expedited federal authorization for these services, following the federal application submission there will be multiple opportunities for implementation planning, operational analysis, community engagement, and technical assistance for providers and Medicaid members.
- This proposal is in addition to the [1115 SUD Demonstration Amendment Request](#) submitted to the Centers for Medicaid and Medicare (CMS) on April 1, 2024, which includes continuous coverage for priority populations, expanded coverage on inpatient mental health treatment, and providing pre-release support services in jails, prisons,

and youth detention facilities.

- While this proposal will be moving forward in 2024, this is not the only HRSN proposal underway right now. Over the coming months and years, there are multiple feasibility studies that will identify what additional populations and benefits should be included in the state’s comprehensive set of HRSN supports. For example, HB24-1322 and HB23-1300 both require HCPF to study the feasibility of providing HRSN supports to Medicaid members, among other innovations. HB24-1322 authorizes HCPF to seek federal authority if HRSN supports are budget neutral to the state.

Why is the timeline moving so quickly?

- HCPF has worked with legislators, other state agencies, and community partners to study the potential for Medicaid coverage for housing and nutrition supports for priority populations. HCPF identified that some housing and nutrition services are well established through state funding, Medicaid partnerships, local and statewide pilots, and have documented community support. HCPF and partners quickly saw an opportunity to create an expedited timeline in order to cover these services as soon as possible, instead of waiting to submit all HRSN benefits together.
- CMS has strongly encouraged states to submit proposals and to capitalize on unprecedented support by CMS to expand [certain housing and nutrition related services](#). HCPF is well-positioned to meet this call sooner than anticipated due to strong alignment between the CMS guidance and extensive HRSN research and provider network building efforts over the past few years. Thanks to multiple pilot programs, local investments in housing and nutrition, and state investment in serving individuals with housing and nutrition challenges, Colorado has already completed many of the required elements needed for a demonstration proposal.



What is involved in the amendment request process?

- HCPF will host 3 stakeholder meetings for attendees to learn more about the proposed HRSN 1115 waiver amendment, ask questions and offer feedback on the proposed service set and population, and learn about timelines and ways to be involved. These meetings will all cover the same content. See next steps below.
- HCPF expects to post the HRSN 1115 waiver amendment draft for public comment in June 2024 and then facilitate two public hearings, with both in person and virtual options. This will be an opportunity for stakeholders to ask questions and offer additional comments on the publicly posted amendment.
- Starting in July 2024, HCPF will host ongoing forums to provide updates on

implementation plans and progress. Sign-up for our [newsletter](#) to receive updates on these forums.

- By August 2024, the state will complete a standard application that defines the population and scope of services to be covered. By closely following the population and service scope [outlined by CMS](#), Colorado increases the likelihood of rapid amendment approval.
- Upon approval of the amendment, HCPF will write the state’s implementation plan over an approximately 6-month period starting winter 2024/2025, with an anticipated implementation date of July 2025. This plan will be created in collaboration with other state agency partners for submission to CMS, and define factors related to operationalizing these services.

What benefits and populations will be included in the proposal?

Proposed Housing and Nutrition Supports Covered through HRSN Demonstration

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| <ul style="list-style-type: none"> ● Pre-tenancy and tenancy sustaining services ● Housing transition navigation services ● One-time transition and moving costs ● Rent/temporary housing for up to 6 months | <ul style="list-style-type: none"> ● Utility costs up to 6 months ● Nutrition counseling and education, including on healthy meal preparation ● Medically-tailored meals ● Meals or pantry stocking |
|--|---|

Proposed Population to be Eligible for HRSN Benefits

- Medicaid members who are experiencing homelessness, at risk of homelessness, or transitioning out of a nursing facility, and who have at least one or more of the following conditions or circumstances:
 - Behavioral health need
 - Chronic health condition
 - Transitioning out of the foster care system

- This list is based on specific CMS guidance, and includes projects with existing state funding, well-documented evidence and community support.
- HCPF is closely following guidance provided by CMS through a state health official letter ([SHO-21-001](#)) and services already approved in other states. This guidance on service expansion also aligns with priorities identified by stakeholders in Colorado.
- As of February 2024, CMS has approved eight 1115 waiver demonstrations under the new [HRSN waiver framework](#). [KFF](#) provides a detailed overview of recent approvals to address health related social needs (HRSN), including population and service scopes, which include housing and nutrition

How will this impact Colorado?

Will this expand funding for housing and nutrition supports in Colorado?

- Yes, 1115 waivers bring a 50-90% federal match. The federal policy requires that any savings to the state must be reinvested in the same space of services and population.
- HCPF can only estimate how much federal funding this will bring to the state until

CMS negotiations are complete and opportunities for state match funding to meet budget neutrality requirements are solidified.

- [Additional information on how federal matching works](#)

How does this interact with other waivers as well as enacted and pending legislation?

- HCPF is directed through multiple avenues to expand HRSN services for Health First Colorado members, including additional populations, housing and nutrition supports.
- HRSN Feasibility Studies through [HB23-1300 "Continuous Eligibility Medical Coverage" \(HB23-1300\)](#) and [HB24-1322 "Medicaid Coverage Housing & Nutrition Services"](#) will continue concurrently to this amendment process. The feasibility studies outlined in these two bills will be focused on developing recommendations of services and scope for possible future HRSN service expansions. These efforts to expand HRSN services are guided by stakeholder contributions.
- The state has authority to implement Medicaid coverage of housing and nutrition support through HB24-1322, which authorizes HCPF to seek federal authority for these services and additional expansions if determined to be feasible.
- The proposed HRSN 1115 demonstration waiver amendment includes a limited scope and an expedited timeline. It will be submitted as an amendment to the existing [1115 SUD Waiver Demonstration](#) with the goal of receiving CMS review prior to Colorado's 1115 SUD Waiver Demonstration renewal application, which is due to CMS in December 2024.

How will this impact community support organizations?

How does this 1115 demonstration waiver relate to the Statewide Supportive Housing Expansion (SWSHE) grant and the current funding tenancy and pre-tenancy support services? How does it relate to existing coverage for nutrition and housing supports?

- SWSHE grants included funding for services, as well as for infrastructure costs of the grant and building organizational capacity. Infrastructure funds were only available through the grant period. The new benefit, built from the SWSHE pilot, was approved during the fiscal year 2024-2025 (FY24-25) budget process, and reimburses for tenancy and pre-tenancy services for a subset of providers serving approximately 700 individuals with permanent supportive housing services. Amendments to the 1115 SUD waiver will expand what those services cover, the population covered, and the providers that can bill for these services.
- Health First Colorado currently covers, or is in the process of implementing, a number of housing and nutrition support services for individuals who are receiving Home and Community Based Services through 1915(c) waivers, the State Plan, or services through the Money Follows the Person Grant. For these services the State will ensure, through the implementation process, that these services remain available to eligible members and there is no supplantation of services under the 1115 authority. These services include:
 - Home Delivered Meals
 - Money Follows the Person coverage for Pantry Stocking, Pre-Tenancy Support & Rental Assistance
 - Targeted Case Management - Transition Coordination (TCM-TC)
 - Housing Navigation Services
 - Transition Setup
 - Home Modification/Home Accessibility

- The expedited HRSN 1115 waiver proposal would expand what benefits and services can be covered, what population can receive those services, and expand which providers are able to be reimbursed.

What can I do to help get housing and nutrition support coverage to Colorado?

What does the state need for this initiative to be successful?

- HCPF seeks, as always, input from a variety of stakeholders across the state to ensure these policies support the Colorado landscape. This includes the voices and expertise of members, other state agencies, providers, advocates, and others who will be impacted by these proposed expansions throughout all phases of development, including analysis, design, and implementation.

When will I have the opportunity to give feedback?

- HCPF will host 3 stakeholder meetings for attendees to learn more about the proposed HRSN 1115 waiver amendment, ask questions and offer feedback on the proposed service set and population, and learn about timelines and ways to be involved. These meetings will all cover the same content.
 - May 9, 2024 from 12:00 - 1:00 pm. Register [here](#) via Zoom. (Spanish language interpretation and live captioning available)
 - May 9, 2024 from 5:00 - 6:00 pm. Register [here](#) via Zoom.
 - May 14, 2024 from 5:00 - 6:00 pm. Register [here](#) via Zoom.
- HCPF expects to post a draft of the HRSN 1115 waiver amendment for public comment in June 2024.
- [Sign up here](#) to stay informed about this new HRSN 1115 waiver amendment, public comment opportunities, and other ways to engage in the future.

For more information contact

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Learn more [on our HRSN webpage](#)

[Sign up for the newsletter](#)