

# Foundational Community Supports (FCS) Service Supplanting Guidance

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Foundational Community Supports (FCS) services are meant to build upon and enhance existing services, prioritizing populations who would otherwise struggle to access housing or employment via other programs. This means that FCS pays for supportive housing and supported employment services when **no other public funds** are already dedicated to providing comparable services to the participant. Comparable services are defined as those consistent with the intent and scope of the FCS supportive housing or supported employment benefits (see the [FCS Provider Manual](#) for service descriptions).

Enrolling an individual in FCS services in order to replace funding for supportive housing services or supported employment services that are **already** being delivered to a **current** supportive housing or supported employment participant is supplanting resources. This is not allowed because Medicaid is a payer of last resort.

## Supportive Housing

For **new or future** participants who are not yet receiving any comparable services, eligible individuals can enroll in FCS supportive housing services.

FCS can serve people who are receiving minimal housing case management services (such as Housing and Essential Needs participants) whose housing stability and health would benefit from receiving FCS supportive housing services. In this case, the individual must meet FCS eligibility criteria and be authorized by the Amerigroup Third Party Administrator (TPA) before receiving FCS services. This is not supplanting resources because FCS is not replacing comparable services; rather, FCS is enhancing services that are not adequately meeting the participant's needs.

## Allowable Resource Coordination

## Supported Employment

For **new or future** participants who are not yet receiving any comparable services, eligible individuals can enroll in FCS supported employment services.

FCS can be braided with services offered via the DSHS Division of Vocational Rehabilitation (DVR). Please refer to the [DVR and FCS fact sheet](#) for additional guidance. However, the same participant cannot receive the same type of DVR and FCS employment service at the same time. A participant must be authorized by the Amerigroup Third Party Administrator (TPA) before receiving FCS services, and a DVR counselor must approve employment goals and an employment plan before DVR services are provided.

## Foundational Community Supports and the Indian Health Service

There is one exception to Foundational Community Supports resource supplanting rules. For tribal populations, services offered by the Indian Health Service are considered to be the payer of last resort, even after Medicaid services.

Contact [MedicaidTransformation@hca.wa.gov](mailto:MedicaidTransformation@hca.wa.gov) for more information about the Foundational Community Supports program.