

# Compliance Guidance for HRSN Rent/Temporary Housing Services

## Best practices for providers: documentation and payment

The purpose of this document is to assist providers in understanding the federal and state compliance requirements for the new **Rent/Temporary Housing** benefit under the Medicaid Transformation Project's (MTP 2.0) health-related social needs (HRSN) services. This document provides background information on the compliance requirements and outlines best practices for providers serving qualified Apple Health (Medicaid) clients who may qualify for Rent/Temporary Housing.

### Importance of compliance with Rent/Temporary Housing requirements

The Rent/Temporary Housing benefit has special rules, including time limits and requirements to avoid supplantation. For Washington to be able to provide these benefits, it is important for providers to comply with this guidance to uphold the state's agreement with the federal government.

**“Supplantation” is the use of funds to replace – rather than supplement – an existing funding stream that is already allocated for a particular service or program.**

Federal Medicaid rules require that the Rent/Temporary Housing benefit only be provided in addition to other rental assistance subsidies that Apple Health clients may receive through other state programs such as, Apple Health and Homes (AHAH) and Home and Community Services (HCS).

**Example:** An Apple Health client is currently enrolled in or authorized to receive a Governor's Opportunity for Supportive Housing (GOSH) subsidy through Washington State Department of Social and Health Services (DSHS) for 12 months. This client is also eligible for Rent/Temporary Housing. In this situation, their enrollment in Rent/Temporary Housing must add up to 6 months of rental assistance on top of their existing 12-month GOSH enrollment, totaling 18 months of rental assistance.

Providers supporting the delivery of the Rent/Temporary Housing benefit play a critical role in ensuring the state's compliance with federal requirements. Providers must demonstrate:

- That their client meets the federal eligibility criteria.
- That their client receives the Rent/Temporary Housing benefit only up to the approved time limits.
- That the Rent/Temporary Housing benefit supplements, rather than “supplants,” other existing state-funded housing services clients may receive.

### How to ensure Rent/Temporary Housing compliance

To ensure adherence to federal requirements, it is important that providers understand how they can support compliance while ensuring high-quality service delivery and positive client outcomes. Best practices for providers to ensure Rent/Temporary Housing compliance are listed below.

## 1. Maintain strong documentation verifying a client's eligibility for Rent/Temporary Housing.

Per the HRSN billing guide, providers determining eligibility and referring clients into Rent/Temporary Housing must:

- Document all social and clinical eligibility criteria.
- Confirm medical appropriateness.
- Ensure consent for services (as needed).
- Prepare a person-centered housing support plan to facilitate appropriate benefit authorization.
- Ensure compliance with federal requirements.

## 2. Communicate with client about how the benefit intersects with other programs.

Providers should ensure Apple Health clients understand how the Rent/Temporary Housing benefit operates with other housing programs. Ensure clients understand:

- HRSN Rent/Temporary Housing is a room-and-board-only service, subject to a **maximum of 6 months per household per demonstration period** by the federal government.
- It **may** be provided concurrently with housing support services (e.g., FCS-SH) that do not include coverage of room and board.
- It **may** be provided before, after, or at the same time as state-funded housing subsidies if it does not reduce the state-funded subsidy dollars already authorized for the client.
- It **may** be provided concurrently with other HRSN benefits that include room and board and a clinical intervention (e.g., Medical Respite Care), but would be limited to a **global cap of a combined up to 6 months per rolling 12-month period**. A rolling 12-month period is defined as a 12-month period starting at the first month of an HRSN service that includes room and board.

**Example 1:** If a client received room and board services through Medical Respite Care for 3 months and Rent/Temporary Housing for 3 months, the client would have to wait until the current rolling 12-month period is over to receive another service that includes room and board.

**Example 2:** If a client receives first month's rent through the HRSN Housing Transition Navigation service, the client may be eligible for an additional 5 months of rental assistance during the remainder of the demonstration period.

## 3. Maintain clear recordkeeping to support utilization monitoring.

Providers must demonstrate that a client's enrollment in Rent/Temporary Housing complies with the benefit's time limits and does not replace previously authorized state-funded subsidy dollars.

Providers can help ensure compliance by clearly documenting (as applicable):

- The start and end dates for each housing benefit/service a client receives, including the order of administering Rent/Temporary Housing relative to a state-funded subsidy.
- The time at which funding sources switch from Rent/Temporary Housing to a state-funded subsidy after a client meets the 6-month cap for the federal service.

These data points will support the state and third-party administrator's (TPA's) ability to properly track different funding sources for each housing service received by a client.

#### 4. Support referrals and connections to other housing support services and programs.

Providers should facilitate warm handoffs to other housing support services and programs that clients need. These warm handoffs will contribute to clients' housing support plans and ensure positive outcomes. Key steps providers can take include:

- Supporting eligibility determinations for other federal, state, or local housing services/programs.
- Coordinating with relevant housing providers and TPAs to facilitate a client handoff.

#### 5. Communicate any questions or concerns directly with state agencies.

Providers should contact the appropriate state agency for questions or issues related to the Rent/Temporary Housing benefit, such as eligibility, referrals, authorization, utilization, and related documentation and recordkeeping requirements.

Agency	Contact information
<b>Health Care Authority (HCA) – FCS</b>	Email address: <a href="mailto:HCAFoundationalCommunitySupports@hca.wa.gov">HCAFoundationalCommunitySupports@hca.wa.gov</a> Website: <a href="#">FCS page</a>
<b>Apple Health and Homes (AHAH)</b>	Phone: 844-451-2828 Email address: <a href="mailto:HCAFoundationalCommunitySupports@hca.wa.gov">HCAFoundationalCommunitySupports@hca.wa.gov</a> Website: <a href="#">AHAH page</a>
<b>Home and Community Living Agency (HCLA)</b>	Email address: <a href="mailto:hrrsn@dshs.wa.gov">hrrsn@dshs.wa.gov</a> Website: <a href="#">HCS page</a>