

A background image of a man with dark skin and a beard, wearing a blue shirt, holding a set of keys in his right hand. He is looking down at the keys with a slight smile. The background is a warm, out-of-focus indoor setting.

HR 1 Implementation Series

Home and Community Based Service Expansion Opportunities

October 28, 2025



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[csh.org](https://www.csh.org)

POLL:

Where are you joining us from today?

- A. Northeast (e.g., NY, MA, PA, ...)
- B. Midwest (e.g., IL, OH, MI, ...)
- C. South (e.g., TX, FL, GA, ...)
- D. West (e.g., CA, WA, OR, ...)
- E. US Territories
- F. Other (please specify)



Today's Agenda

...

- Learning Objectives
- Key Provisions of HR1 related to HCBS
- Why HCBS is key to PSH
- HCBS Basics
- Partner Experience
- Action



Learning Objectives

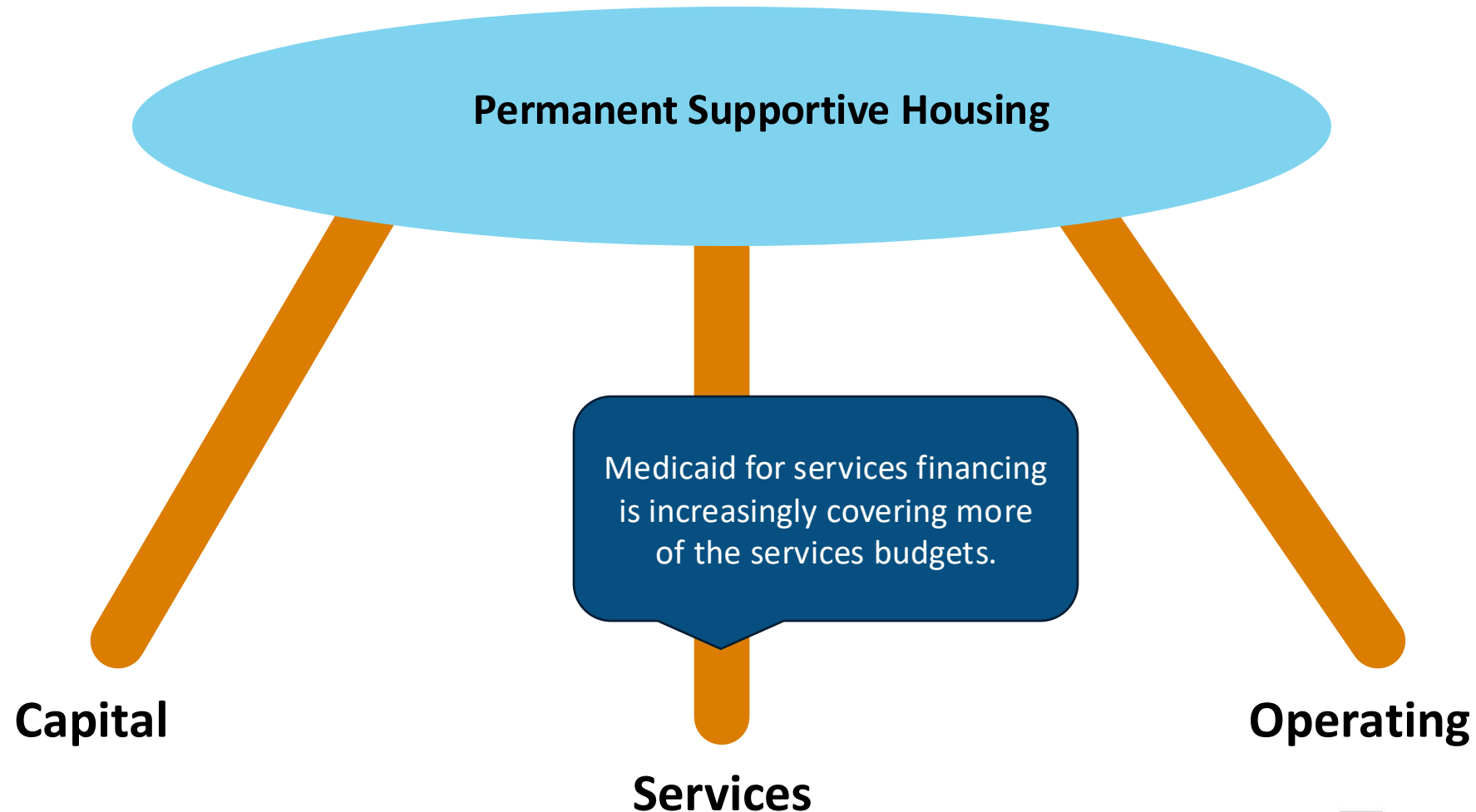
- Provide information on Medicaid program Home and Community Based Services and H.R. 1 changes
- Identify ways to work in partnership between supportive housing and HCBS by sharing some cross-sector approaches





H.R.1 Reshapes Medicaid: What Housing Providers Need to Know Now - Corporation for Supportive Housing

Sources of Funding to Establish and Manage Supportive Housing



CMS Information Bulletin- June 2015

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-26-12
Baltimore, MD 21244-1850



CMCS Informational Bulletin

DATE: June 26, 2015

FROM: Vikki Wachino, Director
Center for Medicaid and CHIP Services

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

This Informational Bulletin is intended to assist states in designing Medicaid benefits, and to clarify the circumstances under which Medicaid reimburses for certain housing-related activities, with the goal of promoting community integration for individuals with disabilities, older adults needing long term services and supports (LTSS), and those experiencing chronic homelessness¹. Consistent with statute, CMS does not provide Federal Financial Participation (FFP) for room and board² in home and community based services,³ but can assist states with coverage of certain housing-related activities and services.

This Bulletin underscores CMS' commitment to help states expand home and community-based living opportunities consistent with the Affordable Care Act, the implementation of the Home and Community Based Services (HCBS) settings final rule governing Medicaid's 1915(c) HCBS Waiver program, 1915(i) HCBS State Plan Option, and 1915(k) Community First Choice State Plan Option⁴, as well as the Americans with Disabilities Act and the Supreme Court's decision in *Olmstead v. L.C.*⁵. The information in this Bulletin is based on evidence from studies demonstrating that providing housing-related activities and services facilitates community integration and is cost effective. This Bulletin is also intended to help states design benefit programs that acknowledge the social determinants of health, and contribute to a holistic focus on improvement of individual health and wellness.

Describing Housing-Related Activities and Services

Most broadly, housing-related activities include a range of flexible services and supports available to individuals with disabilities and older adults needing LTSS, as well as collaborative efforts among key Medicaid and housing agency staffs and stakeholders. In recent years, the

¹ CMS and SAMHSA are working on providing additional guidance to clarify the circumstances under which Medicaid reimburses for certain housing-related activities and services for persons experiencing chronic homelessness.

² Room and board also includes capital funds used for new construction or rehabilitation of housing.

³ There are two exceptions that are described in the paragraph on 1915(c) waivers on page 5.

⁴ Final Rule - CMS 2249-F - 1915(i) State Plan Home and Community-Based Services, 5-Year Period for Waivers, Provider Payment Reassignment, Setting Requirements for Community First Choice, and CMS 2296-F 1915(c) Home and Community-Based Services Waivers, published January 10, 2014, available at <http://www.medicare.gov/HCBS>

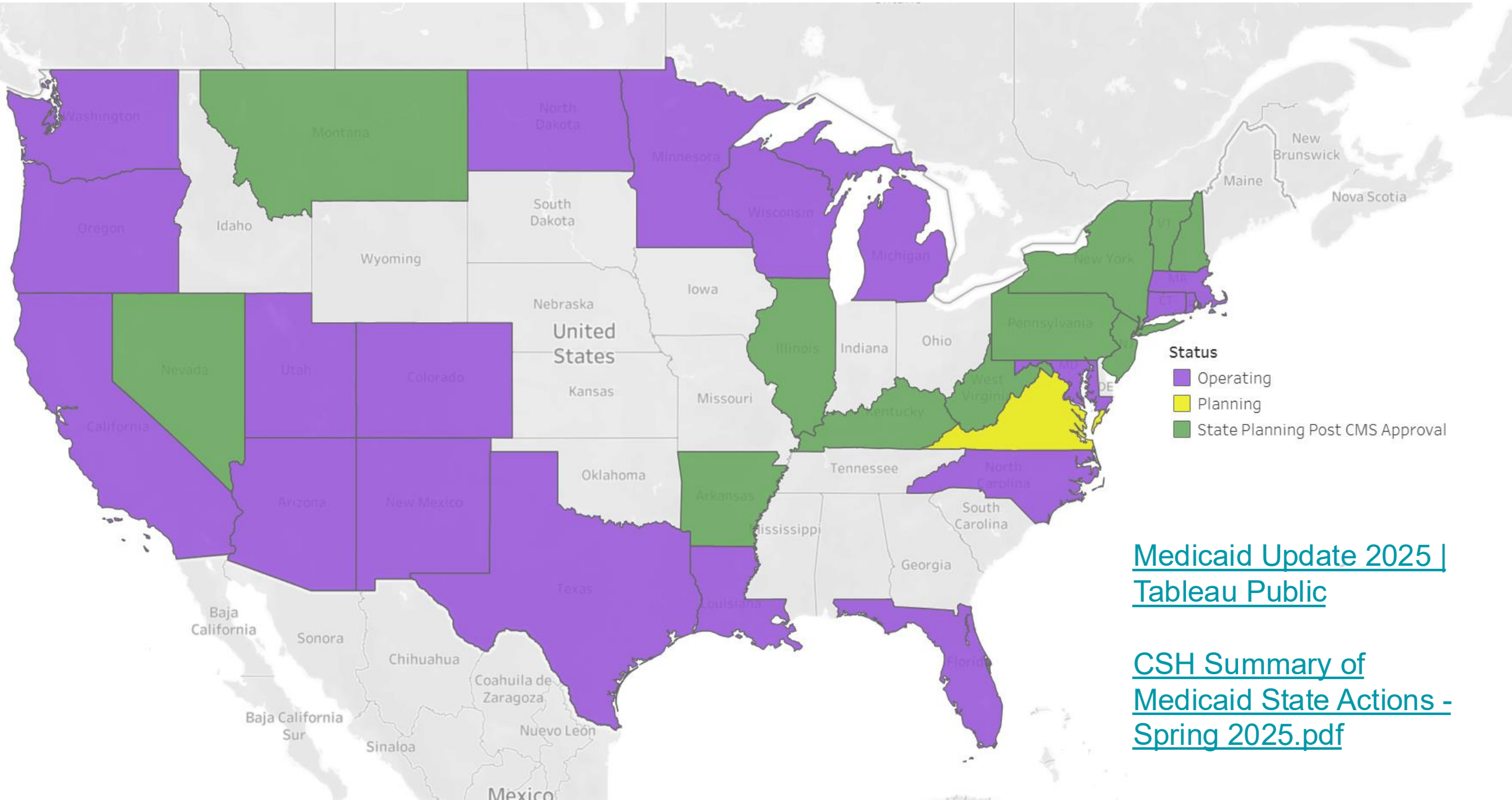
⁵ Americans with Disabilities Act and as interpreted in the U.S. Supreme Court's 1999 decision in *Olmstead v. L.C. (Olmstead)*. For details: Statement of the Department of Justice on Enforcement of the Integration Mandate of Title II of the Americans with Disabilities Act and *Olmstead v. L.C.* http://www.ada.gov/Olmstead/ada_Olmstead.htm

The information in this Bulletin is based on evidence from studies demonstrating that providing housing-related activities and services facilitates community integration and is cost effective.

The CMS sees these services as “Home and Community Based Services”.

Approved waivers and SPAs in FL, HI MN all require the states to structure tenancy support services into the state's existing HCBS infrastructure.

Is my state covering Housing Related Services?



HR 1 Key Provisions Impacting Medicaid

Seven major provisions make up almost \$1 trillion of cuts and 7.5 million people are expected to lose health insurance coverage over the next 10 years.



The diagram consists of two identical graphic elements side-by-side. Each element features a solid orange rounded rectangle in the background. Overlaid on the bottom half of this rectangle is a white rounded rectangle with a thin blue border. Inside the white rectangle, the text 'Enrollment & Eligibility' is written in a large, black, sans-serif font, centered horizontally.

Enrollment &
Eligibility

Finance and
Payment

Medicaid Eligibility

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graph TD; A[Medicaid Eligibility] --> B["ABD (Aged, Blind, Disabled)"]; A --> C["Expansion Group"]; B --> D["For low-income seniors and individuals with disabilities"]; C --> E["For low-income adults under ACA"];
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ABD
(Aged, Blind,
Disabled)

For low-income
seniors and individuals
with disabilities



**Expansion
Group**

For low-income
adults under
ACA

HR 1 & Home and Community Based Services

- HR 1 eliminated the federal NFLOC requirement to qualify for HCBS , allowing states to define alternative eligibility criteria
- Historically, HCBS eligibility required individuals to meet NFLOC criteria to receive services in community settings instead of nursing homes
- Implications: expanded access, state flexibility
- Potential challenges: budget pressures

Understanding of the “Why” of HCBS



SUPPORT AND CARE IN
HOME OR IN
COMMUNITY SETTINGS
RATHER THAN
INSTITUTIONS



MAINTAIN
INDEPENDENCE AND
IMPROVE QUALITY OF
LIFE IN FAMILIAR
SURROUNDINGS



HOME BASED
SERVICES TO SPECIFIC
CLINICAL
POPULATIONS



REDUCES RELIANCE
ON COSTLY
INSTITUTIONS BY
FOCUSING ON
COMMUNITY
INTEGRATION AND
PERSONALIZED CARE

HCBS Basics

- Medicaid Long Term Support Services
 - Nursing Homes (mandatory)
 - Home and Community Based Services (optional, 47 states and 250+ waivers)
 - 1915i (statewide)
 - **1915c (limited eligibility but expanded under HR1)**





Additional criteria for new HCBS authority under H.R.1

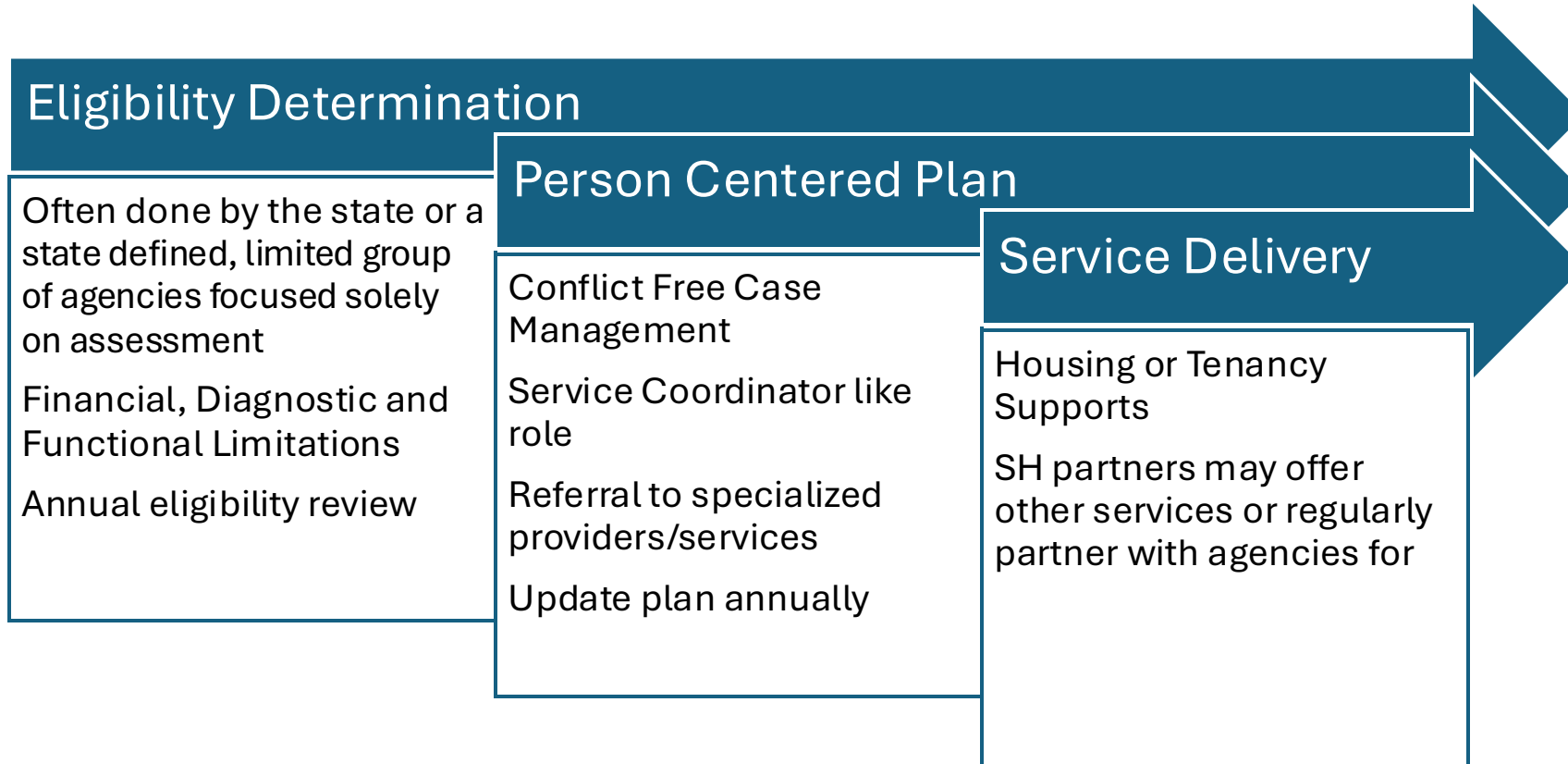
This new standalone waiver request is for 3-year period with additional 5 years at state request: HHS cannot approve a state request before July 1, 2028, but states will be developing long before that date.

Average wait time to receive HCBS must not be longer than under other approved waivers.

State must establish needs-based criteria that are no more stringent

Benefit must be cost neutral as compared to the average per capita cost of individuals receiving institutional care.

What's Involved in an Individual Accessing HCBS



Key HCBS Services

- Personal care assistance (bathing, dressing, eating)
- Home health care (nursing, OT/PT therapies)
- Respite care for caregivers
- Transportation
- Meal delivery
- Case management/Care coordination
- Environmental modifications
- Assistive Technology
- Services that secure and/or maintain housing
- Behavioral support services



Washington State

- How did HCBS' GOSH and Office of Housing and Employment start?
- What does supportive housing at HCLA look like now?
- How does the partnership work between supportive housing providers and HCLA? (or anything you want to share about the cross-sector work)



WHAT WE DO

HOUSING TEAM



SUPPORT independent housing options for HCS clients

ADMINISTER housing resources and Supportive Housing services

FOCUS on subsidies and tenancy support

LIAISON between field, contractors, and available Long-Term Services & Supports (LTSS)

Recommended Actions

- Engage with state coalitions that work for better access and care for Medicaid recipients.
- Engage with your state Medicaid agency to advocate for new 1915(c) waivers with expanded eligibility for individuals who have experienced homelessness
- Help state identify a manageable pool of eligible people; help state with accountability measures to ensure quality and prevent fraud, waste and abuse.
- Monitor CMS guidance and state-level implementation plans to ensure equitable access and quality standards



Next Session

- Rural Hospital Transformation Fund efforts
- TENATIVE: November 18th, 2:30 pm ET
- Sign up at [Corporation for Supportive Housing - CSH Events - Housing Webinars and Trainings](#)



Thank you!

Learn more at www.csh.org



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