



INFORMATIONAL LETTER NO. 2539-MC-FFS

DATE: December 14, 2023

TO: Case Managers, Targeted Case Managers, Integrated Health Home (IHH)
Care Coordinators, Money Follows the Person (MFP) Transition
Specialists, Community Based Case Managers (CBCM)

APPLIES TO: Managed Care (MC), Fee-for-Service (FFS)

FROM: Iowa Department of Health and Human Services (HHS), Iowa Medicaid

RE: Residential Assessment Changes

EFFECTIVE: Upon Receipt

On March 17, 2014, the Centers for Medicare, and Medicaid Services (CMS) issued a final rule for Home and Community Based Services (HCBS) requiring states to ensure all settings where HCBS waiver and habilitation services are provided are or can become compliant with the [HCBS Final Rule](#)¹. The time between the establishment of the final rule and the deadline for all states to comply is referred to as the “transition period.” The transition period ended on March 17, 2023.

Iowa Medicaid took several steps to ensure compliance with the final rule prior to March 17, 2023, including assessing all residential and non-residential settings where HCBS are provided. The assessment of residential settings was primarily accomplished through the administration of the Residential Assessment – [Form 470-5466](#)².

The Residential Assessment – Form 470-5466 was introduced in 2017 by [Informational Letter \(IL\) No. 1842-MC-FFS](#)³ as a means of assessing the individual residential settings where HCBS members live and receive waiver and Habilitation services. The current version is a PDF that must be downloaded, completed and uploaded to the [Iowa Medicaid Portal Access \(IMPA\)](#)⁴.

¹ <https://www.medicaid.gov/medicaid/home-community-based-services/guidance/home-community-based-services-final-regulation/index.html>

² <https://hhs.iowa.gov/media/6037/download?inline>

³ <https://secureapp.dhs.state.ia.us/imp/Information/Bulletins.aspx>

⁴ <https://secureapp.dhs.state.ia.us/imp/Default.aspx>

Iowa Medicaid reports results of residential assessment activity to CMS and must ensure ongoing monitoring and assessment of HCBS settings after the transition period. Due to the limitations of the current PDF format, several key data elements are not reportable. Additionally, form users report multiple issues with the process of downloading and uploading the tool to IMPA. For these reasons, effective January 1, 2024, residential assessments for all HCBS waiver, Habilitation and MFP members will be completed through direct entry into a new application in IMPA. **Residential Assessment – Form 470-5466 will no longer be used to complete residential assessments after this date.**

A new residential assessment must be completed using the new application with all HCBS waiver, Habilitation and MFP members by March 31, 2024. Ongoing, case managers must complete a residential assessment with members within 30 days of admission to a waiver, Habilitation or MFP program and within 30 days of a move to new residence.

Registration:

To use the new application, case management groups and individual case managers must be a registered IMPA user and be assigned specific user rights. If you are not registered, go to [IMPA⁵](#), and click on “Register.” From the IMPA link, a registration form will soon be available to gain access to the new Residential Assessment application. Case management groups and individual case managers who have access to “HCBS File Upload,” should automatically be registered to the new Residential Assessment application. Case management groups and individual case managers are strongly encouraged to ensure registration for the new application prior to January 1, 2024.

Training:

Case managers must complete the Residential Assessment Training available on the [HHS website⁶](#) prior to completing a residential assessment in the new application. The training held on December 12, 2023 will be available soon in the [Competency Based Training Archive⁷](#). The training provides instructions for completing and submitting this required document. A Frequently Asked Questions (FAQ) document will also be maintained and posted on the HHS website.

Case managers are also encouraged to complete further training on the HCBS Settings Final Rule found on the [HHS website⁸](#).

⁵ <https://secureapp.dhs.state.ia.us/imp/Default.aspx>

⁶ <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/cbt>

⁷ <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/cbt>

⁸ <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/cbt>

A quick start Residential Assessment User Guide will also be available in IMPA prior to the January 1, 2024 launch date, to assist in using the new application.

If you have questions, please contact Iowa Medicaid Provider Services:

Iowa Medicaid Provider Services:

- Phone: 1-800-338-7909
- Email: imeproviderservices@dhs.state.ia.us