



INFORMATIONAL LETTER NO. 2588-MC-FFS

DATE: June 4, 2024

TO: Home and Community-Based Services (HCBS) Waiver Providers, Case Managers (CM), Targeted Case Managers (TCM), Integrated Health Home (IHH) Care Coordinators, Managed Care 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: Changes to the Home and Community-Based Services (HCBS) 1915(c) Waivers

EFFECTIVE: Immediately

The purpose of this informational letter (IL) is to provide notice and information regarding changes to Iowa Medicaid policies impacting the Home and Community-Based Services (HCBS) waivers.

Pursuant to the authority of Iowa Code section 249A.4, HHS has amended the 1915(C) HCBS AIDS/HIV, Brain Injury (BI), Health and Disability (HD), Intellectual Disability (ID) and Physical Disability (PD) Waivers. The Centers for Medicaid and Medicare services approved these amendments on April 23, 2024, retroactive to November 1, 2023. As part of the amendments the Department has made the changes listed below to the waivers.

Amendment	What this means.
Allows spouses and legally responsible persons (parents of minors) to be employed as the member's caregiver. AIDS/HIV, BI, HD, ID and PD waivers.	The parents of minors and spouses may now be considered for providing Supported Community Living (SCL), Consumer Directed Attendant Care (CDAC) and Consumer Choices Option (CCO) services to members.
Adds the Waiver Priority Needs Assessment to the HD and PD Waivers and adopts the	Individuals who have applied for waivers and have been placed on the waiver waitlist may complete form 470-5795 Waiver

universal WPNA form for the BI and ID waivers.

[Priority Needs Assessment \(WPNA\)](#)¹ and submit it to the Department for consideration of waitlist prioritization. Individuals meeting the Emergent or Urgent Need Criteria will move up the waiver waitlist based on the date of the request and number of emergent and or urgent criteria met.

Waitlist prioritization does not guarantee access to the waiver. The following criteria must also be met:

- A funding slot must be available; and
- The applicant must be financially eligible; and
- The applicant must meet the level of care for the waiver.

Adds Adult Day Care in the home as a service under the AIDS/HIV, BI, HD and ID waivers.

For individuals who need a level of supervision and support due to the primary caregiver's absence due to working or attending school, the individual may receive adult day care in their home to enable them to remain in the home and otherwise avoid institutionalization. For additional information refer to [IL No. 2468-MC-FFS](#)².

Adds Medical Day Care for Children as a service under the AIDS/HIV, BI, CMH, HD and ID waivers.

Children (aged 0-18) residing in their family home who, because of their complex medical or complex behavioral needs, require specialized exceptional care that cannot be served in traditional childcare settings may request this service. For additional information refer to [IL No. 2468-MC-FFS](#)³.

Adds to the Supported Community Living (SCL) service definition the criteria for services to be delivered in a Host Home*.

Individuals authorized to receive SCL may receive their SCL services in a Host Home when it:

- Is chosen and preferred as a service delivery method by the person and their guardian (if applicable).
- Appropriately meets the individual's assessed needs.
- Is provided within the scope of the service being delivered.
- Is provided as specified in the individual's support plan.

Adds to the Supported Community Living (SCL) service definition the criteria for services to be delivered via Remote Support*.

Remote support is the provision of SCL by a trained remote support professional who is in a remote location and is engaged with a person through enabling technology that utilizes live two-way communication in addition to or in place of on-site staffing. Individuals authorized to receive SCL may receive a portion of their SCL services via remote support when it:

¹ <https://hhs.iowa.gov/sites/default/files/documents/470-5795.pdf>

² <https://secureapp.dhs.state.ia.us/IMPA/Information/ViewDocument.aspx?viewdocument=5180ddef-ed4f-499c-96de-c2e5c7435b89>

³ <https://secureapp.dhs.state.ia.us/IMPA/Information/ViewDocument.aspx?viewdocument=5180ddef-ed4f-499c-96de-c2e5c7435b89>

- Is chosen and preferred as a service delivery method by the person or their guardian (if applicable).
- Appropriately meets the individual’s assessed needs.
- Is provided within the scope of the service being delivered.

Adds Enabling Technology for Remote Support* as a service under the BI and ID waiver service. Enabling technology means the technology that makes the on demand remote supervision and support possible and includes a device, product system, or engineered solution whether acquired commercially, modified, or customized that addresses an individual’s needs and outcomes identified in his or her individual service plan.

Individuals choosing to receive a portion of their SCL services via remote support will be able to receive the enabling technology necessary to allow services to be delivered via remote support. Includes the technology needed to improve a participant’s ability to perform activities of daily living, control or access his/her environment or communicate.

- Includes the assessment for identification of the enabling technology.
 - The assessment is interview based and intended to assess the member’s interest, readiness and need for enabling technology. The Enabling Technology Screening tool is utilized to inform the person-centered planning process.
- Includes the enabling technology:
 - Detectors (carbon monoxide and motion)
 - Sensors (movement, fall detection, seizure detection, door/window, water, smoke, heat, freeze)
 - Reminders (check-in, medications)
 - Wearable/Portable technology, Global Positioning System (GPS), smart watch
 - Smart Appliances (med dispensers, thermostats, security cameras, washers/dryers, dishwashers, refrigerators, ovens/microwaves, tv, coffee maker)
 - Tablets or laptops
 - Applications that work with smart technology
 - Hub – devices can be connected through one central point to trigger alerts and notifications.

Enabling Technology Assessment

Assessment Per Assessment T2029 UA: Rate \$425.00

Enabling Technology - Assistive Technology

Equipment Per Job T2029 UB: Rate – the cost of the enabling technology

Annual Limit \$4,000 per member per year

Adds Telehealth as a service delivery option for specific HCBS Waiver services.

“Telehealth” means the delivery of SCL services using real-time interactive audio and video, or other real-time interactive electronic media, regardless of where the health care professional and the covered person are each located.

“Telehealth” does not include the delivery of health care services delivered solely through an audio-only telephone, electronic mail message or facsimile transmission.

- 96158 Behavioral programming (i.e., health and behavioral intervention); first 30 minutes
- 96159 Behavioral programming (i.e., health and behavioral intervention); each additional 15-minute unit
- H0032 Behavioral programming (i.e., mental health plan development);15-minute unit
- H0031 Behavioral programming (mental health assessment);15-minute unit
- T1016 and T1017 Case management (targeted or waiver);15-minute unit
- H0004 Counseling (individual); 15-minute unit
- 96164 Counseling (group) (i.e. health and Behavior intervention); first 30 minutes
- H0036 Mental health outreach;15-minute unit
- 96165 Counseling (group) (i.e. health and Behavior each additional 15 min
- 97802 Nutritional counseling (initial);15-minute unit
- 97803 Nutritional counseling (subsequent);15-minute unit
- H2016 Supported Community Living; daily
- H2015 Supported Community Living; 15-minute unit
- T2018 UC Supported Employment (Individual Employment)
- H2025 U4, U3, U5, U7, UC Supported Employment (Long Term Job Coaching)

Adds Community Business as a qualified provider under Consumer Directed Attendant Care (CDAC).

Community businesses that have all necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations, and that submit verification of current liability and workers’ compensation coverage may enroll to deliver CDAC. Businesses seeking to deliver CDAC will not be required to be certified to deliver Supported Community Living (SCL), Adult Day Care or Assisted Living Services prior to enrolling as a CDAC provider.

Removes the age limitation on Interim Medical Monitoring and Treatment (IMMT) BI, HD, and ID waivers.

Individuals authorized to receive IMMT may continue to receive IMMT past their 21st birthday when medically necessary to meet their needs. These services are limited to additional services not otherwise covered under the state plan, including Home Health and Early Periodic Screening Diagnosis and Treatment (EPSDT), but consistent with waiver objectives of avoiding institutionalization.

Updates definition of major and minor incidents.

Incidents that involve a member receiving HCBS must be reported. All waiver service providers, case managers, IHH Care Coordinators, and MCO community-based case managers (CBCMs), regardless of delivery system (i.e., FFS or managed care), are required to be reported by the end of the

next calendar day using the Iowa Medicaid's Iowa Medicaid Portal Access (IMPA) System. Suspected abuse or neglect may be reported to the statewide abuse reporting hotline operated by HHS.

“Major Incidents” are defined as an occurrence involving a member that is **enrolled** in an HCBS waiver, targeted case management, or habilitation services, and that:

1. Results in a physical injury to or by the member that requires a physician's treatment or admission to a hospital,
2. Results in the death of the member, including those resulting from known and unknown medical conditions,
3. Results in emergency mental health treatment for the member, (EMS, crisis response, er visit, hospitalization)
4. Results in medical treatment for the member, (EMS, ER visit, hospitalization)
5. Results in the intervention of law enforcement, including contacts, arrests, and incarcerations,
6. Results in a report of child abuse pursuant to Iowa code section 232.69 or a report of dependent adult abuse pursuant to Iowa code section 235b.3,
7. Constitutes a prescription medication error or a pattern of medication errors that leads to the outcome in bullets 1, 2, 3, 4, 5 and 6 above,
8. Involves a member's provider staff, who are assigned protective oversight, being unable to locate the member,
9. Involves a member leaving the program against court orders, or professional advice, or
10. Involves the use of physical or chemical restraint or seclusion of the member.

Minor Incidents” are defined as an occurrence involving a member who is enrolled in an HCBS waiver, targeted case management or habilitation services, and that is not a major incident and that:

- (1) results in the application of basic first aid;
- (2) results in bruising;
- (3) results in seizure activity;

- (4) results in injury to self, to others, or to property; or
- (5) constitutes a prescription medication error.

For additional information refer to [IL No. 2128-MC-FFS⁴](#) and [IL No. 2480-MC-FFS⁵](#).

*For additional information related to these policies please refer to the [Iowa Medicaid HCBS webpage⁶](#) on the HHS website.

Please submit any questions regarding this IL to HCBSwaivers@dhs.state.ia.us.

⁴ <https://secureapp.dhs.state.ia.us/IMPA/Information/ViewDocument.aspx?viewdocument=4b4c6ad2-7325-4115-8d70-92b6f2d3ce27>

⁵ <https://secureapp.dhs.state.ia.us/IMPA/Information/ViewDocument.aspx?viewdocument=49793eb3-181a-4242-b681-259116a82b55>

⁶ <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/iowa-medicaid-programs/hcbs>