

## AHCCCS Transition to the Statewide Housing Administrator

### Frequently Asked Questions

Updated June 22, 2021

In February 2021, AHCCCS awarded its AHCCCS Housing Program (AHP) Housing Administrator contract to the Arizona Behavioral Health Corporation (ABC). The changes will go into effect on October 1, 2021. [https://www.azahcccs.gov/Resources/Downloads/Solicitations/Open/RFPs/YH21-0002/YH21-0002\\_HousingAdministratorRFPFinal.pdf](https://www.azahcccs.gov/Resources/Downloads/Solicitations/Open/RFPs/YH21-0002/YH21-0002_HousingAdministratorRFPFinal.pdf)

### Helpful Definitions

**Health Care Providers** – Integrated clinics, behavioral health practitioners, health homes, and other entities providing behavioral health care for persons with a Serious Mental Illness (SMI) designation or with General Mental Health and/or Substance Use Disorder (GMHSUD) needs.

**Housing Providers** – Agencies or organizations that are under contract or receive AHCCCS NTXIX funding and/or subsidies for housing persons with an SMI designation or other mental health needs.

**Permanent Supportive Housing/Housing Specialists** – Agencies or organizations that receive AHCCCS NTXIX or Medicaid reimbursement to provide housing supportive services including assistance with housing placement.

**Owners** – Entities or individuals who own or have legal title to property that is available for AHCCCS Housing Program members. This includes private landlords as well Community Living Program (CLP) property owners.

**Housing Administrator** – ABC, who AHCCCS selected through a competitive Request for Proposal process, for the management and administration of payments and duties for NTXIX funded AHCCCS Housing Programs.

**Property Management** – Specific responsibilities of landlords and property owners related to the operation of their property, including but not limited to, collection of tenant rents, administering lease requirements, processing legal notices including evictions, legal duties, and property maintenance. Property owners and Housing Providers may have delegated these duties to a third party through a services contract or block lease to an AHCCCS Housing Provider.

### Frequently Asked Questions

#### 1) Why is AHCCCS contracting for Housing Administrative Services?

The AHP Housing Administrator will standardize housing practices, improve overall customer service, and ensure accountability for AHCCCS's housing resources. Additionally, ABC and its contracted provider HOM, Inc. have proposed service enhancements including online tools to expedite housing searches, landlord outreach, and recruitment to increase housing options for AHP members.

## **2) What is the AHCCCS Housing Program (AHP) and what housing does it include?**

AHP includes housing vouchers and units that are funded with Non Title XIX/XXI State SMI General Funds, Supported Housing Funds, or the SMI Housing Trust Fund (HTF) to provide permanent supportive housing for persons designated SMI (as well as limited units for persons identified as having General Mental Health/Substance Use Disorder) and experiencing homelessness. It includes the following specific program elements:

- Scattered Site Program – AHP funds utilized to provide housing subsidy vouchers to allow members to identify and lease housing in community. The program serves individuals determined SMI as well as GMH/SUD members
- Community Living Program – AHP funds used to provide rental subsidies in fixed site or group leased facilities purchased with AHCCCS SMI HTF to house individuals determined SMI. This includes some specific units dedicated to members also participating in intensive service programs (i.e., Assertive Care Teams (ACT))
- Bridge Housing Programs – As part of special collaborative programs with local Housing Authorities or other housing subsidy voucher programs, AHCCCS provides short term rental subsidy while member applies for and secures permanent voucher for long term/permanent housing subsidy
- Eviction Prevention and Housing Support Activities – AHP funding can provide limited support for other housing related expenses beyond Permanent Supportive Housing rental subsidies. Key activities may include emergency rent assistance or eviction prevention, housing move in kits (not to include furniture), reimbursement to landlords for member caused damages, landlord recruitment efforts, and move in and/or utility deposits
- Special Projects – Through partnerships, AHCCCS provides operational support and/or administrative funding to support Continuum of Care, Public Housing Authority partnerships, or other housing subsidy programs that are dedicated to serving individuals determined SMI and receiving services through the RBHA.

## **4) What housing programs are not covered?**

AHP and the AHCCCS Housing Administration services described herein do not include or cover any licensed behavioral health residential or other long term care facilities, grant funded housing programs (i.e., SABG RRH), Transitional Housing Programs (or Flex Care) or housing funds provided directly to the Tribal Regional Behavioral Health Authorities (TRBHAs).

## **5) What will the Housing Administrator Do?**

Beginning on October 1, 2021, similar to a Public Housing Authority (PHA), the AHP Housing Administrator will perform the following administrative functions statewide for all AHCCCS AHP programs. This includes duties Housing Administrative duties currently provided and paid for under RBHA contract Housing Providers:

- Accept provider housing referrals for AHCCCS housing subsidies and programs
- Manage waitlist processes
- Verify housing eligibility
- Match persons on waitlist to appropriate housing vacancies or vouchers

- Hold and staff pre-tenancy briefings for members (and providers) to go over housing processes and tenancy requirements
- Monitor member search times and provide extensions for search
- When member identifies a unit:
  - Perform rent reasonableness assessments
  - Calculate rent subsidy including utility allowance and tenant contribution (maximum of 30% of income)
  - Review leases/lease terms
  - Perform Housing Quality Inspection
  - Complete HAP agreement
- Provide move in boxes
- Pay monthly subsidy to landlord/owner or agent as documented in HAP agreement
- Perform all annual certification or recertifications at renewal/lease term
- In addition to key functions, AHP Administrator is also responsible for:
  - Ensuring legal compliance with applicable federal, state, and local housing laws in all AHP programs
  - Providing tax and financial documentation to landlords
  - Providing housing reporting and metrics to AHCCCS as defined in the contract
  - Comply with all AHCCCS housing policies and processes as defined in contract, AHCCCS Contractors Operations Manual (ACOM) Housing Policy 448, and related AHCCCS Housing Guidebook
- ABC subcontracts with HOM to provide day to day housing services under the contract.

**6) What policies or rules will govern the AHP including the duties of the Housing Administrator?**

Health plan duties under the AHCCCS Housing Program are generally described and governed by the AHCCCS Contractors Operations Manual Policy 448 and related contracts. AHCCCS will also issue and maintain an AHP Guidebook which will document specific housing policies and processes.

**7) What are AHCCCS key goals in the transition? Will funding be moved between GSAs or programs?**

At the present time, it is the goal of AHCCCS and the Housing Administrator ABC to maintain all current levels of services throughout the transition. This includes ensuring that all currently housed members retain their housing and all currently available units in the AHP inventory are maintained in each GSA. AHCCCS does not intend to reallocate the distribution of housing funds between GSAs or housing types at this time. Maintenance of current effort through the transition includes housing capacity and services to rural communities.

Per the AHP contract, the Housing Administrator will be required to maintain a statewide presence. While this does not mean every community will have an office, the Housing Administrator will establish staffing presence in all geographic service areas as well as develop strategies to ensure accessibility and presence in all counties and communities services by AHP programs. This will include developing strategies for coordination and process to serve the housing needs of eligible members of Arizona's tribal communities living off a reservation. AHCCCS will continue to directly manage housing funds granted to TRBHAs. After transition, through the Housing Administrator, AHCCCS will have improved information on housing need and program effectiveness.

## **8) What will change with Housing Administrator?**

Changes in the new Housing Administrator structure will depend on the role currently played by your organization or agency. Below are examples of roles and their associated changes.

- Residents/Tenants – The only change for current resident will be that their housing subsidy will be paid to the property owner (or their property manager) by the Housing Administrator. Tenants will also be responsible for paying their share of rent (up to 30% of rent based on their income). Tenants must continue to comply with all terms of their lease. Residents may also contact the Housing Administrator or their health care provider (or supportive housing staff if applicable) to resolve housing issues and avoid eviction.
- Landlords – Landlords/Owners will continue to receive subsidy payments per their lease or HAP agreements and must continue to abide by terms of their lease agreements and the Arizona Landlord Tenant Act (ARLTA).
  - AHP currently has some CLP Owners/landlords who have block leased their units or subcontracted Property Management duties to third party Housing Providers. These block lessees or Housing Providers have received administrative or other AHP reimbursement for these services.
  - Going forward, owners/landlords will be responsible for including these costs in their rent structure.
  - To facilitate transition and to maintain current housing units during the first year, ABC (with AHCCCS approval) will offer a fixed rate for property management services to maintain these relationships.
- Housing Providers – AHCCCS RBHAs contract with agencies to be Housing Providers and provide units under CLP for persons determined SMI. These contracts included reimbursement for rent as well as for other duties that may have included Housing Administration duties, property management or supportive service delivery. Under the Housing Administrator, AHCCCS will no longer pay administrative or other reimbursement for Housing Administrative services, property management (see above) or supportive services under AHP funding.
- Permanent Supportive Housing Providers/Specialists – As noted above, some providers were permitted or contracted to provide supportive services with AHP funding/reimbursement. These reimbursements will no longer be allowed going forward. AHCCCS will work with health plans and providers to identify Medicaid reimbursable strategies to ensure continuity of housing supportive services.

## **9) What will health plans and providers (health homes and clinics) be responsible for?**

- RBHAs, health plans and providers will be responsible for:
  - Assessment and documentation of eligibility for AHP programs including behavioral health status (e.g., SMI determination) and housing need (e.g., homeless status, institutional discharge status, etc.)
  - Identification of any special housing program eligibility (e.g., ACT team participation)
  - Providing referrals of eligible members to the Housing Administrator
  - Providing documentation or performing any assessments related to housing prioritization such as the VI-SPDAT

- Providing and coordinating all behavioral health and housing based wraparound services to assist members in attaining or maintaining housing for members participating in the AHP and other housing programs, consistent with service plans and care coordination requirements.

**10) Who will manage waitlists?**

The AHCCCS Housing Administrator will be responsible for managing a single statewide housing waitlist. The waitlist will be able to be organized by housing type, project type, and by region. The Housing Administrator will also be responsible for matching waitlist candidates to housing vacancies based on defined prioritization methodology established by AHCCCS in consultation with community stakeholders.

**11) What will the transition look like? What needs to be addressed now for a smooth transition to be smooth?**

The goal is for the Housing Administrator is to begin payment of all AHP obligations and perform all duties as of 10/1/21. To ensure this transition is effective, AHCCCS and the Housing Administrator have requested critical documentation and housing materials from all RBHAs and providers and have held numerous interviews and meetings to fully understand and ensure the effective transition and improvement of all current RBHA managed housing functions. Additionally, AHCCCS will be requesting the follow assistance going forward to ensure a successful transition:

- Compliance - Continued compliance from health plans and housing providers for requests for information, data, and other documentation of current housing processes
- Communication – AHCCCS asks that internal questions from current housing stakeholders as well as other community questions be directed to AHCCCS or the Housing Administrator who will both continue to hold public and other stakeholder communication opportunities. This also includes providing productive feedback on ACOM 448 as well as staying informed through available communication channels including FAQs and other web postings.
- Tenant and Landlord Communication – AHCCCS and the Housing Administrator have posted a timeline of upcoming activities and communication to residents/tenants and landlords. These communications regarding payment of rent and tenant transitions will be issued in August and AHCCCS expects RBHAs to assist in distribution and timely messaging.
- Patience – This is a significant change and opportunity for AHCCCS’s housing programs to improve member services, standardize services, and serve more members with housing. It is important to provide positive and constructive feedback for a successful transition.

**12) How does this transition to a Housing Administrator flow into the Medicaid waiver for Whole Person Care and the Health and Housing Opportunities Proposal (H2O)? What does this communicate to AHCCCS administration, state legislators, and CMS? Is this helping to reduce healthcare costs?**

The experience of AHCCCS and its health plans in managing its NTXIX Housing programs has demonstrated the programmatic benefits and cost effectiveness of housing in meeting the overall integrated health care needs for all populations, and in particular those experiencing homeless or housing instability. Please see AHCCCS’s Housing One Pager included with the H2O proposal for

additional information on the cost impacts of AHCCCS Housing Programs. The move to a Housing Administrator to further standardize, improve cost effectiveness and programmatic coordination is part of AHCCCS larger efforts to integrate housing into AHCCCS array of Medicaid services and demonstrates to the public, policy makers and residents that AHCCCS housing is a critical and unique asset that must be managed professionally using evidence based and professional standards to ensure fairness and quality.

Other key efforts involving housing and that will involve AHP programming include AHCCCS' Whole Person Care Initiative incorporating housing as well as other strategies to address social risk factors of health, the develop of a Closed-Loop Referral System to expedite Medicaid providers' ability to make referrals to housing and other social risk factor services (e.g., food, transportation, shelter), and the Targeted Investment Program.

AHCCCS has also submitted an 1115 Waiver as part of its H2O (Housing and Health Opportunities) Amendment to CMS. If approved, the H2O waiver request will expand homeless populations eligible for housing supports and wrap around services, expand availability of housing supports and fill critical gaps in AHCCCS's current array of services for persons experiencing homelessness or housing insecurity, especially those with mental health needs.

**13) How will this benefit AHCCCS' housing system and stakeholders**

- a) Tenants/Members – Members will have more transparency, standardization, and consistency in housing options, quality, and housing support across the state. It is also the goal to increase awareness and access to AHCCCS housing programs for all eligible members including some who may be underserved in the current system.
- b) Providers – The Housing Administrator will also provide more transparency for providers making referrals. The Housing Administrator will offer additional supports for housing teams including a landlord database and access to housing locators statewide to assist in identifying housing units. The Housing Administrator will work closely with providers to assist in coordinating housing and services to promote housing retention and success.
- c) Landlords – The Housing Administrator will standardize rent and payment processes for landlords including efforts to ensure that all properties/leases rental rates are based on reasonable and fair market standards. Landlord support and services will be provided to encourage and support property owners willing to serve AHCCCS members.