

Foundational Community Supports Transitional Assistance Program Guidelines

Table of contents

PROGRAM BASICS.....	5
Overview and purpose	5
Housing First.....	5
Permanent Supportive Housing	5
Fund source.....	6
PROGRAM ELIGIBILITY	6
Eligibility criteria	6
Behavioral health treatment need.....	6
Priority population	6
FCS TAP SUBSIDY GUIDELINES	6
Recipient agreements	6
Maximum spending amount.....	7
Duration of FCS TAP funding for an enrollee.....	7
Requesting an Exception to Policy	7
Number of times FCS TAP can be accessed by an enrollee	8
Responsibility for ongoing rent.....	8
Renting from friends and family	8
Fair housing and nondiscrimination.....	9
Housing quality and habitability	9
Determining unit habitability	10
Information on lead-based paint.....	10
Collecting a <i>W-9</i> form from landlords	10

Washington <i>Residential Landlord-Tenant Act</i>	11
Rental and lease agreements.....	11
Rent limit.....	11
Delivering subsidy payments	12
Avoiding conflict of interest	12
Out-of-state moves.....	12
ADMINISTRATIVE REQUIREMENTS	12
Termination or denial of service policy	12
Reporting requirements.....	13
Data quality.....	14
Date timeliness.....	14
Program monitoring.....	14
Budget caps	14
Allowable expenditures	15
Unallowable Expenditures	15
Reimbursements.....	16
Requirements at time of FCS TAP payment.....	16
BEST PRACTICES	16
Exploring rent affordability.....	16
Upholding enrollee safety and security.....	16
Viewing units with waitlists.....	17
Transitioning enrollees to longer-term housing subsidy programs	17
Roommate agreements.....	17
Using short-term subsidy funding for recovery residences.....	18
Requesting reasonable accommodations and reasonable modifications	18

Using short-term subsidies for shelter-based strategies like motels/other temporary placements 18

Braiding short-term and long-term rental subsidies 19

APPENDICES 20

Appendix A: Allowable expenditures (quick reference list)..... 20

Appendix B: Unallowable Expenditures 22

Appendix C: Required policies and procedures 23

Appendix D: Documentation standards 24

Appendix E: Other resources 25

GLOSSARY 26

Program basics

Overview and purpose

The Foundational Community Supports Transitional Assistance Program (FCS TAP) offers funding to FCS supportive housing enrollees as they take steps to achieve short and long-term housing goals. The purpose of the funding is to lower financial barriers to affordable housing opportunities and support each eligible enrollee's personal path to housing stability.

When aligned with long-term rental subsidies, FCS TAP assists individuals experiencing complex behavioral health (BH) needs with obtaining and maintaining safe, quality, affordable places to call home in communities of their choice by lowering financial barriers to housing security. Common costs covered by the program include various one-time costs, such as first and last month's rent, security deposits, arrears, utility fees, and more.

Housing First

When serving FCS supportive housing enrollees with FCS TAP, the Housing First (HF) approach should be used. HF is an intervention that aims to prevent and/or end homelessness for individuals with BH and substance use disorder (SUD) experiences by providing housing before anything else. A provider following the HF model offers housing to people experiencing homelessness without the preconditions or requirements of sobriety, treatment, or service participation.

HF aims to swiftly connect individuals and families experiencing homelessness to permanent housing and supportive services to maximize housing stability, financial security, and prevent returns to homelessness. The model recognizes that people need a place to live before tending to less critical needs like acquiring a job or addressing SUD. HF also recognizes that housing program enrollees should exercise choice when selecting housing and participating in supportive services.

Permanent Supportive Housing

Providers should apply dimensions of Permanent Supportive Housing (PSH) during FCS TAP service provision. The Substance Use and Mental Health Services Administration (SAMHSA) recognizes PSH as an effective evidence-based practice that links individuals with community-based housing. PSH includes voluntary and flexible tenant support services designed to meet tenant needs and preferences, ultimately helping them maintain stable, affordable housing.

PSH ensures homes are affordable for people with low incomes, either through rental assistance or housing development status, and provides occupants with tenancy rights under state and local landlord-tenant laws. In addition, supportive housing providers partner with various community entities to bolster access to wraparound support, such as mental health services, alcohol and SUD services, long-term care services, independent living skills, and vocational services.

Dimensions of PSH include:

- Choice of housing: Tenants can access a range of housing choices and living arrangements that meet their preferences.
- Separation of housing and services: There is a functional separation between the housing management and services staff.
- Decent, safe, and affordable housing: The housing is affordable based upon a tenant's income and perspective, and the housing complies with the quality standards of the U.S. Department of Housing and Urban Development.
- Housing integration: The degree to which the person's housing is incorporated into the community or clustered with other persons with disabilities.

- Rights of tenancy: Tenants have full legal rights as defined by local tenant/landlord laws and tenancy is not based upon program rules or treatment participation.
- Access to housing: A person’s access is not dependent upon a demonstration of housing readiness, limited by their barriers to housing, and respects the tenant’s privacy.
- Flexible, voluntary services: The person can choose from an array of adaptive and scalable services that meet their needs. These services should be participant-driven, recovery-oriented, and evidence-based.

Fund source

FCS TAP is backed by state general funds as allocated by the Washington state legislature.

Program eligibility

Eligibility criteria

To be eligible for FCS TAP, a person must:

1. Be actively receiving FCS-eligible Medicaid,
2. Be currently authorized to receive FCS supportive housing services, and
3. Identify as experiencing a BH treatment need.

Behavioral health treatment need

While validation of BH treatment needs is not required, providers must indicate an enrollee’s BH treatment need when submitting monthly expenditure reports to Amerigroup Washington, Inc.

Priority population

FCS TAP aims to assist FCS Supportive Housing enrollees who are transitioning to more stable affordable housing circumstances. FCS TAP service provision does not currently involve a priority population.

With the aim of developing external referral streams that offer FCS Supportive Housing service support to individuals exiting BH treatment facilities and local jails, providers are encouraged to network with BH treatment facilities and establish FCS Supportive housing referral streams. Once an individual is enrolled in FCS Supportive Housing, FCS TAP can be used along their path to housing stability.

FCS TAP subsidy guidelines

Recipient agreements

FCS TAP is distributed by program providers to assist households with paying initial housing-related costs like move-in costs and others. Providers help eligible households use FCS TAP funding to obtain and maintain safe, quality affordable places to live within Washington state. For a general list of items and fees covered by FCS TAP, see [Appendix A](#).

Participation in FCS TAP is voluntary. When paying rent and other costs with a short-term subsidy, follow FCS TAP guidelines to ensure timely application/referral submission, approvals, and subsidy payments. Facilitating communication among all entities during the housing search and lease-up process, including program enrollees, property owners, and managers is essential. Maintaining documentation throughout the subsidy acquisition process is also critical.

FCS TAP recipients include entities such as landlords, property managers, and others who provide goods and/or services, including leasable rental properties and transitional units, to eligible FCS Supportive Housing enrollees upon receipt of payment. FCS TAP enrollees are individuals with an active authorization to receive temporary funding assistance via FCS Supportive Housing. FCS TAP enrollees will not receive direct payment from HCA or any third-party administrator (TPA). Timely

payments are made on behalf of program enrollees by staff from each program's respective service provider.

Providers are expected to develop certain policies and procedures relating to provision of FCS TAP. For a list of required policies and procedures, see [Appendix B](#).

Maximum spending amount

Max spending per enrollee is estimated at \$5,000 per enrollee per 12 months. Any dollar spent over \$5,000 within 12 months must be approved by Amerigroup via an *Exception to Policy (ETP)* request.

Duration of FCS TAP funding for an enrollee

FCS TAP is available to FCS Supportive Housing enrollees so long as FCS TAP funds have not been depleted. FCS TAP uses a rolling authorization period of 12 months for enrollee spending. The 12-month rolling authorization period starts from the first time FCS TAP is used by an enrollee. Once that same date passes the following year, that amount no longer counts towards an enrollee's FCS TAP usage.

Note: Check the FCS TAP *Quick Reference Guide* to learn more about what items can be covered multiple times during an enrollee's authorization, and some can only be used once without an *ETP*.

FCS TAP is a short-term funding assistance program that aims to lower or remove barriers to housing attainment and stability. FCS TAP cannot be used to cover ongoing rents. Only the first month of rent can be covered, with the last month of rent being covered as part of move-in costs when required by a landlord.

Requesting an Exception to Policy

FCS TAP provides short-term flexible funding assistance to FCS Supportive Housing enrollees only. No exceptions may be made for program eligibility. HCA may honor *ETP* requests for multiple circumstances requiring an exemption outside of program eligibility. The *ETP* process allows providers to request an exception to a subsidy program expenditure policy.

An *ETP* may be approved by the Health Care Authority (HCA), or Amerigroup based on the availability of funds, resources, and reported participant needs. *ETPs* are limited and subject to the availability of program funding.

ETP requests must include:

- Enrollee contact information.
- Enrollee demographics.
- Provider contact information.
- The date of the request.
- A description of why the enrollee is unique from others with a similar condition.
- A description of alternative solutions that have been attempted, including a description of each outcome.
- The level of improvement the enrollee has shown after receiving funding assistance.
- What improvements could be reasonably expected if funding is extended.
- How the program enrollee's circumstances may worsen if the funding is not extended.

Note: All *ETP* requests include personal identifying information (PII); therefore, all information, including the request form, must be sent through secure email, fax, or secure file transfer (SFT).

Number of times FCS TAP can be accessed by an enrollee

FCS TAP cannot be combined, or braided, with any other Division of Behavioral Health & Recovery (DBHR) short-term housing subsidy. While DBHR's short-term subsidy programs cannot be combined with FCS TAP, programs may refer individuals to other DBHR supportive housing services and the corresponding short-term subsidy program if and only if an enrollee is eligible for the program's services and they express the desire to enroll.

Note: Each of DBHR's short-term subsidy programs has unique rules regarding the frequency of use and duration. These should be reviewed with the enrollee before transitioning to another DBHR supportive housing service program or short-term funding program.

Responsibility for ongoing rent

FCS TAP does not pay ongoing rents. Upon use of FCS TAP for housing-related fees, providers must assist enrollees with identifying and obtaining longer-term local, state, or federal affordable housing subsidy programs when the program enrollee expresses interest and does not have resources to maintain longer-term housing.

FCS Supportive Housing providers are strongly encouraged to contact local landlords and work with the Washington State Department of Social & Health Services (DSHS), the Department of Commerce, the U.S. Department of Housing and Urban Development (HUD), and other agencies to identify longer-term rental housing subsidies.

Renting from friends and family

Providers can assist program enrollees with renting from friends or family when enrollees express the desire to live with a friend or family member, and when that friend or family member can provide safe, quality, and affordable housing that aligns with an enrollee's preferences.

If the friend or family member owns the home, the enrollee should create a roommate agreement, lease, or housing agreement in collaboration with the household. If a friend or family member is currently living in a rental unit and they invite an enrollee to move in, the lease most likely requires current tenants to receive landlord approval. Lease terms should always be followed by the enrollee and provider when requesting for an enrollee to be added to a lease. Enrollees should await landlord approval before moving in.

All financial obligations (i.e., any current past-due rents and any current mortgage delinquencies) should be disclosed to program enrollees and short-term housing subsidy providers before an agreement is signed.

If an enrollee determines moving in with a friend or family member is an appropriate housing option, providers must:

- Aid enrollees with developing a roommate agreement, lease, or housing agreement to receive short-term housing subsidies, when necessary.
- Discuss the parameters of the agreement with the program enrollee.
- Inspect the unit to ensure unit safety and habitability.

Note: If providers are unable to gain access for inspection, short-term subsidy funding may be distributed on the enrollee's behalf if and only if an enrollee has been informed that access must be provided within 30 days. If the provider has not gained access after 30 days, DBHR short-term subsidy payments may be terminated. Further, *ETPs* cannot be honored when inspections have not been

performed; therefore, no home modifications or household sustainability items may be purchased until an inspection has been completed and documented.

Fair housing and nondiscrimination

The federal *Fair Housing Act* and the Washington State Law Against Discrimination protect tenants from adverse housing actions that occur based on race, color, national origin, religion/creed, sex/gender, disability, or family status — each of which are protected classes. Landlords and property managers must comply with the *Federal Fair Housing Act* and its amendments as it now reads or as it may be amended.

Landlords and property managers must comply with the *Washington State Law Against Discrimination*, [RCW 49.60](#), as it now reads or as it may be amended. *RCW 49.60* currently prohibits discrimination or unfair practices because of race, creed, color, national origin, families with children, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, or the presence of any sensory, mental, or physical disability or the use of a trained guide dog or service animal by a person with a disability. [RCW 59.18](#) also contains protections against reprisals or retaliatory actions by landlords, source of income discrimination, and discrimination based on experience as a victim of domestic violence, sexual assault, and stalking.

Local nondiscrimination laws may include additional protected classes. For example, Seattle, Bellevue, Redmond, and unincorporated King County offer additional protections, including protections against source of income discrimination.

Fair housing laws prohibit the following actions:

- Failing to provide reasonable accommodations to a person with a disability
- Refusing to rent to a person or lying about the availability of rental units because of their protected class
- Enforcing a neutral rule or policy that has a disproportionately adverse effect on a protected class
- Retaliating against a resident or applicant because he or she has asserted fair housing rights or has been a witness to a fair housing investigation

For more information regarding fair housing laws in your area and how to report discrimination, visit the Washington State Human Rights Commission (HRC).

Housing quality and habitability

Determination and documentation of housing quality and habitability is a collaborative process completed by program enrollees, providers, prospective landlords, and property managers. Performing housing quality inspections offers opportunities to explore enrollee housing preferences in relation to a unit's attributes. Housing quality assessments also prepare landlords for formal inspections, which are typically performed by an authorized entity when a longer-term rental resource is being used.

A habitability inspection is required unless an enrollee is transitioning into temporary housing, temporarily staying in a hotel/motel, or moving into a pre-existing space, room, or unit in which the participant previously lived with friends and/or family.

Inspections may be performed by another entity so long as the inspection results have been communicated to a provider before subsidy disbursement. Housing Quality Standard (HQS) and Housing Habitability Standard (HHS) inspection results must be documented and retained in the enrollee's file before short-term subsidy funds can be disbursed. Proper documentation must be maintained, including

notes regarding denials due to quality issues or significant changes in unit habitability over time. Washington's Landlord Mitigation Fund may assist landlords with unit repairs and upgrades so that a unit may pass inspection. For more information, visit the [Department of Commerce's Landlord Damage Relief Program page](#).

The following sections provide important information, including tools and other resources, for appropriately documenting habitability.

Determining unit habitability

FCS Supportive Housing providers must establish a method for conducting habitability inspections and documenting results.

State law outlines obligations to keep rental units safe and livable. Landlords must maintain their units to comply with all local codes that govern housing quality and provide adequate heat, hot water, and locks. For a complete list of landlord duties, review [RCW 59.18.060](#).

Unit habitability inspections help ensure rental units are decent, safe, and sanitary by establishing they meet minimum health and safety criteria. Providers are responsible for documenting habitability by performing a [Housing Habitability Standards \(HHS\) Form](#) or a [HUD Housing Quality Standards \(HQS\) Inspection Form](#). HQS or HHS inspections must be performed before an individual signs a lease. While it is a best practice to perform HQS inspections on all rental units, HHS forms are sufficient when the longer-term rental resource allows for an HHS inspection. Check the longer-term rental resource's guidelines concerning housing quality to identify the appropriate inspection form.

A copy of the HQS and HHS inspection results must be retained in an enrollee's file. You can download HCA's fillable PDF versions of [HQS](#) and [HHS](#) forms online. When a dwelling does not pass an HQS or HHS inspection, landlords may qualify for landlord mitigation resources. Explore information about [Washington's Landlord Mitigation Fund](#) online.

Information on lead-based paint

Providers and/or tenants must collaborate with landlords and property managers to ensure that a lead-based paint visual assessment is completed prior to payment of a short-term housing subsidy. Landlords must give the following to prospective tenants of any property:

- EPA-approved information on identifying and controlling lead-based paint hazards:
 - For more information, see the EPA's [Protect Your Family from Lead in Your Home](#) (March 2021).
- Any known information on lead-based paint hazards in the home or building; for multi-unit buildings, this requirement includes records and reports involving common areas and other units when that information was obtained in a building-wide evaluation.
- A lead-disclosure attachment to the rental lease, or language inserted in the contract, that includes a [Lead Warning Statement](#) and confirms that the landlord complied with the notification of requirements; for more information, see the EPA's [Sample Disclosure Form for Landlords](#).

To prevent lead poisoning in young children, landlords must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations ([24 CFR 35, Parts A, B, M, and R](#)).

Collecting a W-9 form from landlords

Providers must establish a method for collecting and storing W-9 forms. A W-9 form is a document that the Internal Revenue Service (IRS) provides to verify an entity's social security or tax identification number. When leasing up, landlords, property management companies, and other subsidy recipients are

required to submit a *W-9* to providers so that ownership of the property, goods, and services can be verified. At the end of each year, information from the *W-9*, including the amount paid, is reported to the IRS.

All information, including a hard copy of the *W-9 Form*, must be kept confidential by the provider. Providers are to collect, retain, and submit *W-9* forms to the IRS for each landlord receiving income from a DBHR short-term housing subsidy. Information from the *W-9* and the amount paid to landlords is reported to the IRS at the end of the year as required by law.

Washington Residential Landlord-Tenant Act

Washington has a *Residential Landlord-Tenant Act* which defines the minimum duties of landlords and tenants of residential dwellings. Providers should supply information on the *Washington Residential Landlord Tenant Act (RCW 59.18)* to households receiving short-term rent assistance from DBHR. Providing program enrollees with a condensed version of the act is sufficient. For more information on this law and others, visit washingtonlawhelp.org, select **Housing**, then **Tenant Rights**. Or [click here](#).

Rental and lease agreements

When renting a unit with FCS TAP, a lease or rental agreement between the eligible household and the landlord must be executed at the time of FCS TAP payment. Leases or rental agreements must contain standard lease provisions.

At a minimum, the lease or rental agreement between the landlord and the eligible household must contain the following:

- Name of tenant
- Name of landlord
- Address of rental property
- Occupancy (who gets to live at the rental)
- Term of agreement (lease start and end date)
- Rent rate and date due
- Deposits (if any and what for/term)
- Signature of tenant/date
- Signature of landlord/date

Review the terms and conditions of leases and rental agreements with all program enrollees prior to the program enrollee's signature. Review the rent rate to ensure affordability. Reviewing rent rate and due dates are essential as it is the tenant's responsibility to deliver their individualized portion of rent payments to the appropriate entity moving forward.

A current lease must be kept in a program enrollee's file. Additionally, a copy of a program enrollee's lease must be shown to the appropriate subsidy provider before FCS TAP funds can be delivered.

Rent limit

FCS TAP does not pay ongoing rents. Only initial costs like first month, last month, security deposit, and other initial fees for housing can be covered by each of DBHR's short-term subsidy programs.

FCS TAP users may pay first month rent amounts of up to 120% of **HUD's fair market rent (FMR)**. The rent limit is the maximum rent to be paid for a unit of a given size. When paying move-in costs with FCS TAP, a subsidy is provided for the smallest number of bedrooms needed to safely house the program enrollee or the enrollee's household (if and only if they are the head of household). If a

household consists of additional members, the income of the additional household members should be considered when calculating an individual's FCS TAP request.

If FCS TAP is used in a shared living situation where distinct bedrooms are leased to individuals, the amount for the first month of rent will be calculated for the bedroom. If a program enrollee is seeking housing and planning to regain custody of children, enrollees can rent an appropriately sized apartment, but the subsidy amount will not change.

Delivering subsidy payments

FCS TAP only provides payment directly to entities supplying rental housing or other housing-related goods and services. Program enrollees will not receive payment from Amerigroup, HCA/DBHR (or an affiliated entity), their program provider, or a TPA. Timely payments will be made on behalf of the program enrollee by each respective program's authorized administrator.

Avoiding conflict of interest

When an FCS Supportive Housing enrollee is eligible to obtain housing that is owned and operated by the same agency providing FCS Supportive Housing services, FCS TAP funds can be used so long as:

- A discussion ensuring the enrollee's housing choice is honored takes place between the enrollee and FCS Supportive Housing service staff.
- The discussion should review all relevant housing options available to the enrollee at the time.
- Agency policies regarding move-in fees and other costs being charged cannot be unique to the FCS Supportive Housing enrollee.
- All prospective residents must be charged the same move-in fees for FCS TAP funds to be spent.

Out-of-state moves

When an individual is planning to move outside of Washington state, DBHR's short-term subsidies may only cover housing-related costs that arise in Washington state. No costs can be covered by any entities located in a state other than Washington.

Administrative requirements

DBHR contracts with Amerigroup, the TPA for FCS, to manage FCS TAP. Providers are to submit required documentation to Amerigroup when seeking FCS TAP funding. Administrative fees are not paid to providers for FCS TAP service provision.

FCS providers are required to submit requests for reimbursements to Amerigroup at transitionassistanceFCS@Amerigroup or when FCS TAP funds are spent:

- If a provider has spent FCS TAP funding, a *Request for Reimbursement* must be submitted for that item within 30 days of the transaction by the provider.
- Requests for reimbursement can be sent to Amerigroup as often as once per week, or as infrequently as once a month.
- If a provider does not spend FCS TAP funds during a month, no report should be sent to Amerigroup.

Termination or denial of service policy

Providers must develop and implement a subsidy termination procedure and a subsidy denial policy that aligns with PSH and HF principles. When crafting these policies, it is essential to remember FCS TAP

provides flexible, short-term subsidies that aim to help people transition into stable, affordable, independent housing of their choice.

This policy must:

- Describe the reasons a household would be denied subsidies and/or terminated from program participation
- Describe the notification process.
- Ensure households are made aware of the grievance procedure.

Reminders:

- Participation in FCS TAP is voluntary.
 - If an eligible enrollee chooses not to participate, they cannot be penalized in any way, nor will they lose services that they are eligible to receive from other programs.
 - All DBHR short-term funding assistance programs are separate from support services and property management.
- Program enrollees must be functionally and financially eligible for and agree to receive certain types of Medicaid to gain access to FCS TAP funding.

Reporting requirements

FCS providers are required to submit requests for reimbursements to Amerigroup at transitionassistanceFCS@Amerigroup.org when FCS TAP funds are spent. If a provider has spent FCS TAP funding, a *Request for Reimbursement* must be submitted for that item within 30 days of the transaction by the provider. Requests for reimbursement can be sent to Amerigroup as often as once per week, or as infrequently as once a month. If a provider does not spend FCS TAP funds during a month, no report should be sent to Amerigroup.

Providers must provide details concerning purchases made on behalf of FCS TAP enrollees. Monthly expenditure reports are to be submitted on the FCS TAP *Request Form* spreadsheet, which includes the following fields (all fields with asterisks are required):

- FCS supportive housing provider:
 - Agency name*
 - Agency contact name*
 - Agency contact email address*
 - Agency phone number*
- FCS supportive housing enrollee:
 - Name*
 - Date of birth*
 - Age
 - ProviderOne ID No.*
 - RAC Code*
 - Gender
 - American Indian/Alaska Native tribal membership
 - Housing status
 - If exiting an institution, what type?
 - County*
 - Region*
 - Treatment need*
 - FCS supportive housing authorization start date*

- FCS supportive housing authorization end date*
- Expenditure information:
- Date of expenditure*
- FCS TAP funding category*
- Description of expenditure*
- Notes

Data quality

All fields of the FCS TAP *Request for Reimbursement* form that are marked with asterisks *must* be completed for providers to receive reimbursement. If any portions of the report are left blank or contain errors, Amerigroup will return the report with instructions.

Note: Providers are responsible for tracking all expenditures, including individual enrollee expenses.

Date timeliness

Providers must request reimbursement within 30 days of payment for a good or service. Providers can request reimbursement as often as once per week. Agencies spending FCS TAP funds must submit at least one *Request for Reimbursement* per month for any FCS TAP funds spent within the previous 30 days. If no FCS TAP funding is spent by a provider, no request should be submitted to Amerigroup.

Program monitoring

Quarterly, Amerigroup will randomly sample 10% of FCS Supportive Housing enrollees using FCS TAP funding. During the Quality Assurance Review, Amerigroup will review receipts associated with FCS TAP expenses from the previous fiscal quarter. Amerigroup will also review client files to verify appropriate spending and file documentation.

Client files should include signed and dated copies of the following:

- *Participant Agreement*
- Documentation related to purchases (i.e., receipts)
- When moving into a new unit, documentation related to acquisition of the unit (i.e., signed and dated lease, *Housing Quality Standards* or *Housing Habitability Standards Inspection Form*, and *W-9*)
- If an ETP was requested, a copy of the narrative provided to Amerigroup

If file documentation and/or previously reimbursed expenditures are out of compliance, the provider will be notified. The provider will work with Amerigroup to clarify any discrepancy in spending and documentation. If there is a suspicion of fraud, waste or abuse, Amerigroup and the HCA reserve the right to take corrective action. Corrective action may include recoveries of funds deemed out of compliance, termination of the FCS TAP *Amendment* by Amerigroup or referral to the Amerigroup Special Investigation Unit if fraud, waste, or abuse is suspected.

Fiscal administration

Budget caps

Providers are permitted to spend on specific items on behalf of FCS supportive housing enrollees who are making housing transitions. FCS supportive housing enrollees must be making housing transitions to access FCS TAP funding. FCS Supportive Housing enrollees can use FCS TAP funding with a maximum spending amount of an estimated \$5,000 per 12 month-period. If seeking funding beyond this amount, an ETP must be requested.

Costs for the following FCS TAP funding categories can be covered more than once in a 12-month period:

- IDs and other documentation
- Fees to enter transitional housing
- Application fees, including background checks and credit checks

Costs for the following FCS TAP funding categories can only be covered once during a 12-month period:

- Moving expenses, including reasonably priced moving supplies and a moving vehicle (rented with assistance from provider)
- Move-in assistance (first/last months' rent, deposits, nonrefundable fees)

If a housing-related item is not listed on this sheet but the cost of the item is a barrier to making a housing transition or preventing an eviction, an *ETP* must be requested.

Allowable expenditures

Items may be purchased with FCS TAP funding if and only if a provider has checked ProviderOne to ensure the individual is actively receiving FCS-eligible Medicaid at the time of the proposed transaction and they are authorized by Amerigroup to receive FCS Supportive Housing services. Once a person's Medicaid status is confirmed to be FCS-eligible and FCS services are confirmed authorized, then a provider must review the *FCS Quick Reference Guide* to identify if the good or service is covered by FCS TAP, and up to what amount may be covered.

For a short-list of allowable expenditures, see [Appendix A](#).

Note: Items on this list may only be purchased by participating FCS Supportive Housing providers if the item is listed and the cost is at or below the amount listed. If an item does not appear on the list, or it does appear, but costs more than the amount listed, an ETP must be requested from Amerigroup before any FCS TAP payment can be made for that item.

ETPs can be requested by completing the *ETP* protocol and sending required documentation to Amerigroup at transitionassistanceFCS@Amerigroup.com.

Providers play an essential role in the FCS TAP disbursement process. When participants are approved for FCS TAP funding, providers will deliver payment on behalf of FCS TAP participants. When possible and appropriate, participants should accompany provider staff during the fund payment process, especially when their presence is necessary for consent and contract signatures.

Unallowable Expenditures

The following constitute unallowable expenditures:

- No disbursement of funding directly to an enrollee under any circumstances
- No phone coverage
- No vehicle costs covered
- No washer/dryer unit purchases or repairs
- No stove/oven purchases or repairs
- No medical copays
- No personal hygiene products (i.e., deodorant, soap, etc.)
- No RV/trailer purchases or repairs

- No (personal) debt coverage beyond any debt related to a previous housing circumstance where rent and/or utilities costs are owed (Note: past-due rent coverage may only be requested via ETP)
- No clothing
- No transportation cost coverage

Reimbursements

Amerigroup will reimburse FCS supportive housing providers if and only if an enrollee is both actively enrolled in FCS-eligible Medicaid at the time of the payment and the payment is within the amount listed on the FCS TAP *Allowable Expenditures Reference Guide* or the amount has been approved via the ETP process.

After a request for reimbursement is submitted by a FCS Supportive Housing provider, Amerigroup will notify them by email of approval, denial, or rejection with request for more information within five business days. Approved reimbursements will be sent to providers within 20 business days of receiving a provider's FCS TAP *Request for Reimbursement*.

Note: Agencies participating in electronic fund transfer (EFT) will receive reimbursements more quickly than agencies awaiting reimbursement by check.

Requirements at time of FCS TAP payment

Providers must have access to ProviderOne before spending FCS TAP funds. Gaining access to ProviderOne is critical to FCS TAP service provision and can take 30 days or longer for access to be granted. If you are an FCS provider seeking access to ProviderOne, please review the [Foundational Community Supports ProviderOne Access Guide](#), which can be found on the Amerigroup [FCS provider page](#).

Active FCS-eligible Medicaid providers within the FCS Supportive Housing network must confirm that Medicaid is active and FCS-eligible before making a payment on behalf of the FCS supportive housing enrollee. To do this, providers must access ProviderOne.

Upon confirmation of active FCS-eligible Medicaid and authorization for FCS Supportive Housing services, providers can spend up to the amount listed on the FCS TAP *Quick Reference Guide* on behalf of the enrollee. Amerigroup is not responsible for reimbursing any amount over the amount listed on the FCS TAP *Quick Reference Guide* unless an ETP has been approved.

Best practices

Exploring rent affordability

Discussing affordability of dwellings is critical to the success of any tenancy. Working with program enrollees to establish enrollee income and other financials while respecting a person's privacy is essential to developing an understanding of a person's ability to pay rent, including the appropriate tenant portion. Overall, it is standard for individuals to dedicate 30% of their income for housing and associated costs. When exploring affordability of units with FCS Supportive Housing enrollees, it is essential to build a budget with an enrollee.

Upholding enrollee safety and security

Enrollees may express desire to rent uninhabitable units, units they cannot afford, and units owned by unfit landlords and/or property management companies. When these situations arise, it is critical to review any potentially harmful consequences related to the unit such as those that may impact the health and safety of a tenant. Document these discussions, including outcomes, in an enrollee's *Service Plan*.

Units deemed unsafe and poor landlord practices may also play a role in DBHR requesting more information about a property and may lead to subsidy denial.

Viewing units with waitlists

Program enrollees may express a desire to wait for housing that fits their preferences rather than accept units that do not fit their preferences at any moment before a lease is signed. Although this may prolong instances of housing instability such as homelessness, their choice must be honored by the provider. Moreover, individuals waiting for the housing of their choice should not be punished by service providers for choosing to wait for different accommodations. Any denials of housing should be documented in a program enrollee's housing search log.

Transitioning enrollees to longer-term housing subsidy programs

FCS TAP does not pay ongoing rents. If a program enrollee is seeking longer-term housing, it is essential that providers assist them with applying for a longer-term local, state, or federal affordable housing subsidy program for which they are eligible. Subsidies are temporary in nature and should be combined with other funding streams, whenever possible, to leverage resources to assist individuals in obtaining and maintaining a permanent residence. Program providers are encouraged to work with affordable housing resources funded by the Department of Commerce, DSHS, HUD, and systems such as coordinated entry, to identify short- and long-term housing opportunities, including subsidies.

Federal, state, and local long-term rental subsidy programs provide affordable housing options to community members. DSHS and the Department of Commerce supply a variety of long-term subsidies with specific eligibility criteria. Linking program enrollees with the appropriate long-term subsidies can help ensure rents remain affordable for eligible FCS Supportive Housing enrollees.

Roommate agreements

A roommate agreement expresses an arrangement between two or more people regarding a shared living space. If a lease explicitly allows a tenant to add a roommate with a landlord's consent, then the tenant may do so with landlord approval. Tenants must make a written request to the landlord for permission to move any new occupant into a rental unit.

Roommate agreements outline the rights and obligations of each resident as well as terms and conditions of living together, as agreed to by everyone sharing the household. A basic roommate agreement should contain:

- Names of all tenants:
 - Be sure to list who is the primary tenant and the co-tenant on the lease, and who is entering a roommate agreement outside of the lease.
- Property address
- Lease dates: beginning date and end date of lease
- Dollar amount paid for security deposit
- Dollar amount of rent paid by each roommate:
 - determine who pays rent, how, and when
- Dollar amount of utilities each roommate pays and other information regarding financial obligations for bills
 - Whose name is attached to each bill?
 - Who is responsible for what portion of bills?)
- Notes on apartment rules and property regulations (i.e., pet rules, quiet hours, parking, communal items, and areas, overnight guests, responsibility for damages, and any others that apply)
- Signatures of occupants (include date)

Using short-term subsidy funding for recovery residences

The Substance Abuse and Mental Health Services Administration (SAMHSA) defines recovery residences as safe, healthy, family-like substance free living environments that support individuals in recovery from SUD.

To search for recovery homes (both level 1 and level 2 recovery residences and Oxford Houses), visit [HCA's recovery residences registry](#). Recovery residences listed on the registry are verified by the [Washington Alliance of Quality Recovery Residences \(WAQRR\)](#). When a program enrollee expresses a desire to move into a recovery residence that is not listed on WAQRR's registry, providers are encouraged to discuss risks associated with moving into an unregulated recovery home with enrollees.

Rent and participation fees vary among residence operators. All policies regarding financial obligations must be disclosed to prospective residents prior to lease/agreement signing. Once a lease or program agreement is signed, initial fees like the first month of rent may be covered by any of DBHR's short-term housing subsidy programs upon request.

For more information regarding recovery residences, please review [DBHR's Recovery Residences Fact Sheet](#).

Requesting reasonable accommodations and reasonable modifications

Reasonable accommodation (RA) is a change, exception, or adjustment to a rule, policy, practice, or service that allows a person with a disability to use and enjoy housing, including public and common use areas. Reasonable accommodations eliminate barriers that prevent persons with disabilities from fully participating in housing opportunities, including both private housing and in federally assisted programs or activities. RAs are granted without cost to the resident, and there cannot be extra fees or deposits charged to the person requesting an RA.

Reasonable modification (RM) is a physical change made to a resident's living space, or to the common areas of a community, which is necessary to enable a resident with a disability to have use and enjoyment of the housing. Reasonable modifications can include structural changes to the interiors and exteriors of dwellings. Residents typically pay for RMs unless they live in a federally subsidized unit.

There is no specific form or format for making RA/RM requests. Requests should be made in writing to the landlord or property management company, and a copy of the RA/RM request should be kept in the enrollee's file. Providers cannot not make determinations concerning RA/RM requests and should assist tenants with making requests. Landlords must follow all fair housing and regulatory rules concerning RA/RM requests.

FCS TAP may cover costs for certain RMs upon submission of an *ETP* request. For more information on *ETPs*, visit the [ETP section](#) of this document.

Note: For RA/RM, it is necessary to show there is a need directly related to the individual's disability. The requester may be asked to provide a verification letter from a healthcare provider or reliable third-party who knows about the individual's disability.

For more information, please visit the [Northwest Fair Housing Alliance website](#).

Using short-term subsidies for shelter-based strategies like motels/other temporary placements

Housing subsidy funds should only be used to obtain shelter-based housing solutions when an individual has expressed a clear desire for shelter-based housing, or in some cases, for brief periods of time, when shelter-based strategies appear to be the only available option.

At the outset of any shelter-based housing placement, providers must communicate the temporary nature of a shelter-based solution to enrollees. Providers must also articulate a plan for accessing a permanent housing solution(s) by engaging the individual in transition planning.

When providers use short-term subsidies to obtain shelter-based housing, providers should also prepare to provide increased personalized support to subsidy program enrollees for the duration of any temporary placement. Providers should not use housing subsidies for shelter-based strategies, including motel, hotel, or transitional housing placements, when ample housing support services are not available or there is no plan to aid individuals in obtaining more permanent, sustainable housing solutions.

Braiding short-term and long-term rental subsidies

FCS TAP is designed to provide people experiencing housing instability, including homelessness, with interim support so that they can successfully obtain a safe place to live. Program enrollees must have a lease (or sublease) or an occupancy agreement in place when seeking to use a short-term subsidy.

FCS TAP can cover rent deposits, application fees, move-in costs, and support services. FCS TAP aims to link individuals with longer-term rental assistance opportunities when appropriate, like the [Community Behavioral Health Rental Assistance \(CBRA\)](#) and other longer-term rental assistance programs when eligible.

Appendices

Appendix A: Allowable expenditures (quick reference list)

Items on this list may only be purchased by participating FCS Supportive Housing providers if the item is listed and the cost is at or below the amount listed.

If an item does not appear on the list, or it does appear, but costs more than the amount listed, an *ETP* must be requested from Amerigroup before any FCS TAP payment can be made for that item.

FCS TAP funding category	Items covered	Can spend
IDs and other documentation	Identification documents/cards Birth certificates Social Security cards	Up to \$80 each
Application fees	Rental application fees Background check Credit check	Up to \$100 each
Transitional housing fees	Fees associated with entering certain transitional housing such as urinalysis	Up to \$100 each
Moving expenses Can be used once per 12-month period	Moving vehicle rental Moving supplies	Up to \$300 total
Move-in assistance Can be used once per 12-month period	Security, pet, and/or damage deposits First and last month's rent Any appropriate and reasonable non-refundable fees (fees may be annualized)	Up to \$5,000 total Monthly rent <i>must</i> be under 120% Fair Market Rent (FMR) Enrollee must have ability to pay ongoing rent with or without long-term rental assistance
Home essentials & sustainability items Can only be accessed after a move	Mattress Small household appliances Light furnishings Cleaning supplies	<i>ETP</i> required *Maximum spending amount for any combination of these items: \$1,500
Home modifications Can only be accessed after a move	Reasonably priced home modifications approved by landlords	<i>ETP</i> Required
Arrears Note: A rent ledger reflecting the amount requested must be sent to TransitionAssistanceFCS@Amerigroup.com at the time of the request	Utility Rental Storage	<i>ETP</i> Required *Maximum spending amount for past-due rents and rental arrearages: \$5,000

IDs and other documentation	Identification documents/cards Birth certificates Social Security cards	Up to \$80 each
Application fees	Rental application fees Background check Credit check	Up to \$100 each

Appendix B: Unallowable Expenditures

TAP cannot cover the following:

- No phone coverage
- No vehicle costs covered
- No washer/dryer unit purchases or repairs
- No stove/oven purchases or repairs
- No medical copays
- No personal hygiene products (i.e., deodorant, soap, etc.)
- No RV/trailer purchases or repairs
- No (personal) debt coverage beyond any debt related to a previous housing circumstance where rent and/or utilities are owed
- No disbursement of funding directly to an enrollee under any circumstances
- No clothing
- No transportation cost coverage

Appendix C: Required policies and procedures

FCS Supportive Housing providers disbursing FCS TAP funds are expected to:

- Establish method for collecting and storing *W-9* forms from landlords: [Section 3.11](#)
- Determine and document safety and habitability of housing units: [Section 3.9.1](#)
- Establish termination or denial of service policy: [Section 4.1](#)
- Establish rent limit policy for area with HUD's fair market rent (FMR) tool: [Section 3.14](#)

Appendix D: Documentation standards

Client files should include copies of the following:

- Participant Agreement (signed and dated)
- Documentation related to purchases (i.e., receipts and any documentation that includes date of purchase and cost)
- When moving into a new unit, documentation related to acquisition of the unit
 - (i.e., signed and dated lease, Housing Quality Standards or Housing Habitability
- *Standards Inspection Form*, and *W-9*)
- If an ETP was requested, a copy of the narrative provided

Appendix E: Other resources

Discharge Planner's Toolkit

HCA's Discharge Planner's Toolkit helps discharge planners and others identify programs and services individuals might be eligible for based on responses to several screening questions.

Pathways to Housing

The **Pathways to Housing site** offers a comprehensive overview of resources for individuals seeking affordable housing and housing support services.

Glossary

The following are commonly used abbreviations.

Acronym	Definition	Definition
AFH	Adult family home	Residential homes licensed by a state authority (DSHS) to provide personal care for up to 6 non-related individuals
ALF	Assisted living facility	A residential setting that provides older adults with personalized care
AL TSA	Aging and long-term support administration	An administrative body within the Washington State Department of Social and Health Services (DSHS) that provides long-term care and supports to individuals who are functionally and financially eligible
AMI	Area median income	The midpoint of a region's income distribution
CBRA	Community Behavioral Health rental assistance	Provides permeant rental subsidies for high-risk individuals and households with BH conditions
DBHR	Division of Behavioral Health & Recovery	Designated Washington Health Care Authority division for mental health and substance use disorder treatment and recovery support services
DSHS	Department of Social & Health Services	Washington state agency that provides a wide variety of social and health service programs such as housing assistance, adult care, and disability support
EBP	Evidence-based practice	Commonly accepted as the conscientious, explicit, and judicious use of current best evidence in making decisions about the care of a person
FCS	Foundational Community Supports	Also known as Initiative 3 of the Medicaid Transformation Project, this program offers supported housing and employment services via targeted Medicaid benefits to Washington's most vulnerable and those with complex care needs
FCS TAP	Foundational Community Supports Transition Assistance Program	Short-term, flexible housing subsidy program that received funding via <i>SB 5092</i> (2021-2022) that provides support to FCS supportive housing enrollees with BH treatment needs
FMR	Fair market rent	Used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solutions Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units

HCV	Housing Choice Voucher	Department of Housing & Urban Development program that provides rental assistance to very low-income individuals and families; ultimately, assisting them with paying for decent, safe, and sanitary housing in the private rental housing market, with tenant portions set at or around 30% of a household's annual income
HF	Housing First	An approach to assisting people experiencing homelessness that provides immediate access to permanent housing to end a person's homelessness, thus providing a platform for the individuals to pursue personal goals and improve quality of life
HHS	Housing	HUD's tool for performing housing unit inspections to inspect housing quality; these standards are different from HUD's housing quality standards (HQS) in that they are less stringent and do not require a certified inspector to perform a unit quality review
HMIS	Homeless Management Information System	An information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness
HQS	Housing quality standards	HUD's minimum unit quality standards for tenant-based programs; these standards are more stringent than HHS and are used for federal housing programs
HUD	U.S. Department of Housing and Urban Development	A federal agency that is responsible for addressing housing needs, developing communities, and enforcing fair housing laws in urban areas through policy and programming
OH	Oxford House	Shared, self-governed, self-supported, drug-free housing for individuals in recovery from substance use disorders
PBV	Project-based voucher	Vouchers that are attached to specific rental units whose landlord contracts with a housing agency to rent the unit to low-income families
PHA	Public Housing Authority	Authorized local government entity that administers HUD housing rental housing and assistance programs
PRA	Project-based rental assistance	A type of rental assistance allowing tenants to live in an affordable unit and pay rent based upon their income
PSH	Permanent supportive housing	Evidence-based model that combines low-barrier affordable housing, healthcare, and supportive services to help individuals and families lead more stable lives

RA	Reasonable accommodation	A change, exception, or adjustment to a rule, policy, practice, or service that allows a person with a disability to use and enjoy housing, including public and common use areas
RM	Reasonable modification	A physical change made to a resident's living space, or to the common areas of a community, which is necessary to enable a resident with a disability to have use and enjoyment of the housing
RR	Recovery residence	Substance-free living environment that supports individuals in recovery from SUD through peer support and service connections that promote long-term recovery; the registry of recovery homes provides a list of verified residences that follow the National Alliance of Recovery Residences best practices, allowing residents to use prescribed medication for physical health, mental health, and SUDs
SHP	Supportive Housing Program	HUD program designed to promote the development of supportive housing and supportive services to assist homeless persons in transitioning from homelessness, and to promote the provision of supportive housing to enable homeless persons to live as independently as possible
SRO	Single room occupancy	Small efficiency dwelling units for single individuals that often include sharing a kitchen and/or other facilities
TH	Transitional housing	Temporary housing with support services that aims to bridge the gap between homelessness and permanent independent rental housing
UA	Utility allowance	The amount federally subsidized tenants receive to help pay for reasonable utility bills