

AHCCCS Housing Program Transition FAQs for Landlords & Providers

Effective **October 1, 2021**, Arizona Behavioral Health Corporation and HOM, Inc., will become the new centralized Housing Administrator for the AHCCCS Housing Program throughout the State of Arizona.

ABC provides quality, affordable, and supportive housing for persons with behavioral health needs in Arizona. Since 1999, ABC has provided housing to tens of thousands of AHCCCS members with a focus on high-quality housing program management. You can learn more about ABC at www.azabc.org.

ABC contracts with HOM, Inc., (HOM) to make rent payments and perform day-to-day housing program operations for the AHCCCS Housing Program. HOM has been a trusted partner of ABC for over 20 years and currently serves over 3,500 households in housing for ABC and other partners throughout Arizona. They will be your primary contact after October 1, 2021. You can learn more about HOM at www.hominc.com.

Our goal is to ensure that the transition of the housing assistance is seamless and without disruption to our participants and all involved. The following FAQs provides helpful information related to this change.

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.

General Questions

1. Why is AHCCCS going to a statewide Housing Administrator?

Based on feedback and review of AHCCCS programs, AHCCCS elected to contract for a statewide Housing Administrator to standardize and improve the effectiveness of its housing programs by:

Providing consistent and quality customer services to members, housing, and service providers.

AHCCCS housing funds are currently administered by the Regional Behavioral Health Authorities (RBHAs) through their provider network. By moving from the RBHAs to a statewide housing administrator, AHCCCS will:

- Standardize services and housing programs across the state,
- Introduce new or expand to statewide housing supports including new housing search tools, move in kits and utility assistance,
- Ensure all AHCCCS supported units are safe, habitable, and fairly priced, and
- Reduce administrative costs to increase available housing funds.

ABC and HOM have over 20 years of experience administering housing programs.

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 with an SMI designation, as well as limited units for persons identified as having General Mental Health/Substance Use Disorder (GMHSUD), 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 the community. The program serves individuals with an SMI designation 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 with an SMI designation. 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 including 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 with an SMI designation and receiving services through the RBHA.

3. What are AHCCCS key goals in the transition? Will funding be moved between Geographic Service Areas (GSAs) or programs?

At the present time, it is the goal of AHCCCS and 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 (ABC) 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 GSAs 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 Tribal Regional Behavioral Health Authorities (TRBHAs). After transition, through the Housing Administrator, AHCCCS will have improved information on housing needs and program effectiveness.

4. What will the Housing Administrator Do?

ABC and its subcontractor, HOM, Inc., will be providing housing administration services to AHCCCS members and providers. These services include receiving referrals and housing applications, managing waiting lists, determining eligibility, conducting housing briefings, assisting and supporting members in housing searches, verifying household income and rent contributions, conducting initial and annual Housing Quality Standards (HQS) inspections, paying rental subsidy to landlords or property owners, and assisting with annual recertifications and lease renewals.

Please note, ABC and HOM are not health care providers. Health services will continue to be provided by integrated clinics, health homes, or providers.

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 percent of income),
 - Review leases/lease terms,
 - Perform Housing Quality Inspection, and
 - 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, and
 - 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.

5. What programs will be administered by the Housing Administrator/ABC?

ABC will be responsible for all AHCCCS Housing programs including the administration of rental subsidies for scattered site programs and to providers of Community Living Program models. This does not include Oxford houses, rapid re-housing programs, or other grant funded programs. The Housing Administrator will also not be overseeing other housing subsidy programs for AHCCCS members such as HUD Continuum of Care or Housing Choice Vouchers unless ABC or HOM manages those funds on behalf of those funding programs.

6. 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).

7. What will change with the 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 residents 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 percent 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 – RBHAs contract with agencies to be Housing Providers and provide units under CLP for persons with an SMI designation. 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.

8. 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 designation) 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, and
- 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.

9. 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.

10. What will the transition look like? What needs to be addressed now for a smooth transition to be smooth?

The goal 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' 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.

11. 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.

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 the Centers for Medicare and Medicaid Services (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 homelessness or housing instability. Please see AHCCCS' 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 the AHCCCS Housing Program 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 (TI) 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 eligibility for those experiencing homelessness for housing supports and wrap around services, expand availability of housing supports, and fill critical gaps in AHCCCS' 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 property/lease 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.

Landlord Questions

1. As a landlord, does this change affect my current Housing Assistance Payments (HAP) Contract or agreement with the current Housing Provider?

AHCCCS has designated ABC and HOM as the organizations responsible for administering the AHCCCS Housing Program and they will perform the duties and responsibilities under existing contracts until such time that HOM executes new agreements with landlords for ongoing housing assistance. For more information for landlords, please visit <https://www.hominc.com/landlords-program-basics/>.

We've also written several blog posts for landlords in the last year that provide information on many important topics and program features. Please visit <https://www.hominc.com/blog/> to read those posts.

2. As a landlord, how will my payments be made?

HOM makes its housing assistance payments electronically using ACH and will initially allow payment by check during the transition period for new landlords. Payments for **ALL** housing program participants will be made in one ACH payment for existing landlords. The HOM ACH Authorization form is available on our web site at: https://www.hominc.com/wp-content/uploads/HOM_Direct_Deposit_Authorization_9_20.pdf – and returning it to landlordsupport@hominc.com.

HOM Landlord Support Specialists will work with you during the transition to get you set up on ACH. By receiving your payments via an ACH, it ensures that your rental payment(s) will be deposited into your bank account the first business day of each month and your payments will not get lost or delayed in the mail. It also reduces chances for fraud that we all face every day with check washing, phony checks, and the like. An email is sent to as many email addresses as each landlord wants to designate

that is itemized with the participant's name, unit address, and specifically what is being paid by the ACH, making rent posting a breeze for onsite or corporate finance teams.

Provider Questions

- 1. One of my members currently receives AHCCCS funded housing, who do I contact if my member has questions about their housing?**

Each currently housed member is assigned a Housing Specialist at HOM who can assist with any housing related questions or concerns. You may contact HOM at 602-296-6594 and leave a message and a member of our team will return your call within 24 hours. You can also send an email to AHP@hominc.com.

- 2. As a behavioral health provider, how do I refer members to the AHCCCS Housing Program?**

Referral sources must be on the approved list of agencies per the PSH Guidebook provided by AHCCCS. An approved referral agency will complete the AHP application. This application will then be sent via secure email. For more details, please email ABC at ahpapplications@azabc.org and a member of their team will assist you.

Other Questions

- 1. Who should I call if I have concerns or questions?**

If you have any questions or concerns regarding how to apply or waitlist questions you can contact ABC at AHPinfo@azabc.org or 602-712-9200.

If you have any questions or concerns regarding your current housing assistance or other specific housing participation questions you can contact HOM at 602-296-6594 and leave a message, a member of our team will return your call within 24 hours. Or you can send an email to AHP@hominc.com.