



Alameda County Board of Supervisors
Personnel, Administration, and Legislation (PAL) Committee
LEGISLATIVE POSITION REQUEST FORM

Submission deadline is noon on the Monday two weeks prior to the PAL meeting.
 See FAQ for additional instructions.

Title (Bill/Reg. No., Bill/Reg. Title, Author):		California Advancing & Innovating in Medi-Cal (CalAIM) Transitional Rent Services Amendment	
Version (Date amended):		08/2023	
Position Requested:		Support	
Current Status of Bill/Regulation (Has the bill been referred to committee, or set for hearing? If so, when and what committee? Next hearing?) (Where relevant include comment period dates/deadlines):		Comments due 8/31	
Alignment with Vision 2026:	<input checked="" type="checkbox"/> Shared Visions	<input type="checkbox"/> 10X Goals	<input checked="" type="checkbox"/> Operating Principles
	<input type="checkbox"/> Thriving & Resilient Population <input type="checkbox"/> Safe & Livable Communities <input type="checkbox"/> Healthy Environment <input type="checkbox"/> Prosperous & Vibrant Economy	<input type="checkbox"/> Employment for All <input checked="" type="checkbox"/> Eliminate Homelessness <input type="checkbox"/> Eliminate Poverty and Hunger <input type="checkbox"/> Crime Free County <input type="checkbox"/> Healthcare for All <input type="checkbox"/> Accessible Infrastructure	<input checked="" type="checkbox"/> Collaboration <input type="checkbox"/> Equity <input type="checkbox"/> Fiscal Stewardship <input checked="" type="checkbox"/> Innovation <input type="checkbox"/> Sustainability <input type="checkbox"/> Access
Alignment with Legislative Platform (i.e. "issue"/plank or N/A if not in legislative platform)		Housing as Health: Support "housing first" policies and funding that address and meet the needs of people who are housing insecure, unhoused, or at-risk of becoming unhoused. Support proposals that include housing services as a covered Medi-Cal benefit.	
Summary (Summary of item, use Legislative Counsel's Digest, Bill Analysis, or Bill Summary):			
The state Department of Health Care Services (DHCS) is seeking an amendment to the CalAIM Section 1115 demonstration to provide up to six months of transitional rent services to eligible individuals who are homeless or at risk of homelessness and transitioning out of institutional levels of care, congregate residential settings, correctional facilities, the child welfare system, recuperative care facilities, short-term post-hospitalization housing, transitional housing, homeless shelters or interim housing, as well as those who meet the criteria for unsheltered homelessness or for a Full Service Partnership (FSP) program. Transitional rent services will be available for a period of no more than six months; must be cost-effective; and will be provided only if it is determined to be medically appropriate using clinical and other health-related social needs criteria. Transitional rent services will be voluntary for Medi-Cal managed care plans to offer and for Medi-Cal members to use.			
Background of Bill:			
<input type="checkbox"/> New bill <input type="checkbox"/> Amended <input type="checkbox"/> Gut and Amend <input type="checkbox"/> Similar to other current bills we have positions on		<input type="checkbox"/> Previously Introduced <input type="checkbox"/> Clean-Up Bill <input type="checkbox"/> Urgency Clause	
Seeking Amendments?		No	
Previous Legislation:			
If YES, attach amendments.			
Do all other impacted agencies/departments concur?		N/A	
If YES, list each department and contact person. If NO, see FAQ.			
Click or tap here to enter text.			



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Potential State/Federal Fiscal Impacts (include \$ estimate):	\$17.9 million (\$6.3 million General Fund) in 2025-26 and up to \$116.6 million (\$40.8 million General Fund) at full implementation.
Potential Net County Cost Impacts (include \$ estimate):	N/A
Fiscal Impact:	
<input type="checkbox"/> Adds revenue <input type="checkbox"/> Cost savings <input type="checkbox"/> New/increased fees to offset costs <input type="checkbox"/> Includes appropriation <input type="checkbox"/> Redirects resources <input type="checkbox"/> Changes fines/penalties <input type="checkbox"/> Unfunded mandate <input type="checkbox"/> Additional costs <input type="checkbox"/> Reduces or reduces fees <input type="checkbox"/> Minor impact – program absorption <input type="checkbox"/> None of the above	
Potential Impacts to County Residents (Include specific data):	
<p>Currently, managed care plans are able to offer a range of housing support benefits as a “Community Support.” Alameda Alliance for Health offers these services through a contract with OHCC. Housing transition navigation services assist Medi-Cal members with securing housing, including identifying members’ housing needs and barriers to successful tenancy and with completing housing applications. Housing deposits support members with establishing residence, such as funding security deposits and utility set- up fees, pest eradication, and air conditioners. Housing tenancy and sustaining services provide members with services that aim to maintain safe and stable tenancy, which includes services such as coaching on maintaining key relationships with landlords, linking to community resources to prevent eviction, and health and safety visits.</p> <p>DHCS seeks to expand on these efforts to ensure eligible individuals enrolled in Medi- Cal have access to a safe and stable home following critical transitions, as well as those who meet the criteria for unsheltered homelessness or for a FSP program. The State anticipates approximately 135,000 Medi-Cal members are homeless or at risk of homelessness and experience critical transitions or meet the criteria for unsheltered homelessness or for a FSP program in a given year, and will be potentially eligible for the transitional rent services in MCMC. The CalAIM amendment would authorize these transitional rent services as a new Community Support for qualifying individuals in the MCMC delivery system. The California BH-CONNECT demonstration, through a separate 1115 Waiver application to CMS, would cover these transitional rent services for individuals in the SMHS and DMC-ODS delivery systems.</p> <p>Transitional rent services could be an important tool to address housing needs that are currently unmet in our County, especially for individuals who are experiencing unsheltered homelessness. In Alameda County, on any given day, there are approximately 9,747 individuals experiencing homelessness, with 73% experiencing unsheltered homelessness. Current estimates are that 85% of the homeless population is eligible for Medi-Cal managed care, resulting in approximately 8,285 people who could eligible be for housing-related Community Supports. People becoming homeless in Alameda County (4,033 people, comprised of newly homeless and returns to homelessness) is outpacing the rate at which people move from homelessness to housing (3,010). Eviction/foreclosure/rent increase and job loss were among the primary causes of homelessness identified.</p> <p>Transitional rent may also prevent entrances or returns to homelessness for individuals in our County at-risk of homelessness due to transitions from institutions or other systems of care. Data from the most recent Point in Time Count shows that 29.7% of those experiencing homelessness had at least one interaction with the criminal justice system in the past year, with 5.5% residing in jail or prison immediately before becoming homeless, while 4.6% identified a hospital or treatment facility as their last place of residence. Of the 2,655 discharges from John George Psychiatric Pavilion in 2022, 8.5% transitioned directly to congregate shelter environments.</p>	
Potential Impacts to County Programs, Services, Operations or Departments (Be specific):	



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Like other CalAIM Community Supports, transitional rent services will be voluntary for the Medi-Cal managed care plans to offer and the Medi-Cal member to use and will be offered exclusively through managed care plans. Currently, Alameda County managed care plans contract with HCSA's Office of Homeless Care and Coordination (OHCC) to provide CalAIM housing services to individuals prioritized through Coordinated Entry. HCSA subcontracts with a network of 19 community-based providers to provide the services. As the intermediary, HCSA provides program oversight and utilizes data from the Homeless Management Information System and the Social Health Information Exchange to submit invoices to the managed care plans. DHCS indicates that transitional rent services will be closely coordinated across delivery systems, with other housing-related supports offered as Medi-Cal Community Support services, and with other non-Medi-Cal funded housing services. Successful implementation of this benefit will likely require robust coordination and collaboration between managed care plans and HCSA/OHCC, and/or potentially expand the intermediary role to include this additional community support should managed care plans elect to provide this service to beneficiaries.

Reporting Requirements:

- | | |
|--------------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Requires one-time report/study | <input type="checkbox"/> Requires new reporting form(s) |
| <input type="checkbox"/> Requires annual report | <input type="checkbox"/> Requires amended reporting form(s) |
| <input checked="" type="checkbox"/> No reporting requirement | |

List Known Supporters:	N/A
List Known Opposition:	N/A
Requestor (who is asking for the County to take a position? e.g., agency/dept., association, organization)	
Alameda County Health Care Services Agency	
Approved by Department Head (Name/Date):	Colleen Chawla, Agency Director, Alameda County Health Care Services Agency – 8/31/23
Submitter (Name, Title, Dept.):	Eileen Ng, Policy Director, Alameda County Health Care Services Agency
Submission Date:	8/31/23
CAO Analyst:	Peilin Chen & Razilee Tadeo
Additional Comments:	See attached comment letter

For Internal CAO Use Only:					
Date Received:	Click or tap here to enter text.	Date to Analyst:	Click or tap here to enter text.	Date from Analyst:	Click or tap here to enter text.
Target PAL date:	Click or tap here to enter text.	CAO recommendation:	Click or tap here to enter text.		



August 31, 2023

Department of Health Care Services
Director's Office
Attn: Jacey Cooper and Susan Philip
P.O. Box 997413, MS 0000 Sacramento, California 95899-7413
Submitted via email to: 1115waiver@dhcs.ca.gov

RE: CalAIM Section 1115 Transitional Rent Services Amendment

Dear Ms. Cooper and Ms. Philip,

Alameda County Health Care Services Agency (HCSA) appreciates the opportunity to comment on the Department of Health Care Services' Section 1115 amendment request to include transitional rent services as a new Community Support for qualifying individuals in the Medi-Cal Managed Care (MCMC) delivery system. HCSA supports the department's approach to providing rent subsidies for individuals during critical transitions, those experiencing unsheltered homelessness, and individuals meeting criteria for a Full-Service Partnership (FSP).

Transitional rent services could be an important tool to address housing needs that are currently unmet in our County, especially for individuals who are experiencing unsheltered homelessness. In Alameda County, on any given day, there are approximately 9,747 individuals experiencing homelessness, with 73% experiencing unsheltered homelessness. Current estimates are that 85% of the homeless population is eligible for Medi-Cal managed care, resulting in approximately 8,285 people who could eligible be for housing-related Community Supports. People becoming homeless in Alameda County (4,033 people, comprised of newly homeless and returns to homelessness) is outpacing the rate at which people move from homelessness to housing (3,010). Eviction/foreclosure/rent increase and job loss were among the primary causes of homelessness identified.

Transitional rent may also prevent entrances or returns to homelessness for individuals in our County at-risk of homelessness due to transitions from institutions or other systems of care. Data from the most recent Point in Time Count shows that 29.7% of those experiencing homelessness had at least one interaction with the criminal justice system in the past year, with 5.5% residing in jail or prison immediately before becoming homeless, while 4.6% identified a hospital or treatment facility as their last place of residence. Of the 2,655 discharges from John George Psychiatric Pavilion in 2022, 8.5% transitioned directly to congregate shelter environments.

Currently, Alameda County managed care plans contract with HCSA's Office of Homeless Care and Coordination (OHCC) to provide CalAIM housing services. Alameda County residents who are homeless or at-risk of homelessness and prioritized through Coordinated Entry are eligible to receive Housing Community Support (HCS) services. Over 1,800 people received Housing Community Supports services in 2022. HCSA is supportive of adding transitional rent services to the array of housing community supports already being provided in our County, and we would encourage our managed care partners to implement this benefit. We offer the following thoughts and suggestions:

- **Support robust coordination between all housing delivery systems.** While the transitional rent services that will be authorized by this waiver amendment will be administered by managed care plans, transitional rent services proposed through the BH-CONNECT waiver would be administered by our County's MHP, Alameda County

Behavioral Health (ACBH). Current housing community supports are provided by OHCC and our network of 19 community providers. Coordination and collaboration across delivery systems will be essential to successful implementation of these new benefits, especially regarding transitions and connections between various housing community supports or other community-based services that may be necessary to support sustained housing for clients once the 6-month benefit ends.

- **Provide adequate technical assistance and financial assurances to Managed Care Plans.** Our experience working with managed care plans to roll out housing and other community supports benefits indicates that Managed Care Plans may have hesitancy in rolling out this benefit, or difficulty in administering the benefit. There has been concern regarding reimbursement for the current suite of community supports, and as this benefit will be much more costly, health plans may be hesitant to implement transitional rent without clarity and reassurance that they will receive timely and adequate reimbursement. Additionally, managed care plans may not have the adequate infrastructure to administer transitional rent. DHCS could provide clear guidance on subcontracting with existing community housing providers to ensure effective delivery of the benefit.
- **Consider expanding 6-month benefit.** While 6-months of transitional rent services will certainly support resolution of homelessness for many in the short-term, there is concern that a 6-month benefit may not be adequate for many individuals to successfully resolve all barriers to permanent housing. As most leases are for one year, it is unclear if landlords would be willing to rent units to individuals who cannot demonstrate ability to pay beyond 6-months. In some cases, people will be able to adequately increase their incomes in this timeframe, but we have found that this is not the norm, especially in our high-cost County. Individuals receiving the transitional rent benefit should also be enrolled in housing sustaining services or other relevant supports to ensure they do not lose housing when 6-month benefit period is over.
- **Retain broad eligibility while allowing prioritization.** We appreciate the broad eligibility criteria for the transitional rent benefit. However, if managed care plans are not able to use limiting criteria, there may be capacity issues. DHCS should clarify that, while all who meet the stated criteria are eligible, services may be prioritized based on capacity limitations. Currently, OHCC utilizes coordinated entry prioritization to enroll clients in housing community supports as capacity allows.

Thank you for the opportunity to comment on this initiative. We support the goals of this waiver amendment and are committed to continuing our collective work to prevent and end homelessness in our County. We look forward to working with DHCS and managed care plans to ensure successful implementation of this important new benefit.

Sincerely,

DocuSigned by:



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Colleen Chawla, Agency Director

Alameda County Health Care Services Agency