

Use of Medicaid Waivers to Support Students with Intellectual Disability in College

By Paige Parisi and Julia Landau

An increasing number of states allow students with intellectual disability (ID) to use Medicaid Home and Community Based Services waivers to support participation in postsecondary education (PSE) programs. These waiver services support access to higher education for students receiving Medicaid services who might otherwise not be able to attend postsecondary education.

WHAT IS A MEDICAID WAIVER?

In 1983, Congress authorized the waiver of certain Medicaid requirements to allow states to provide Home and Community Based Services (HCBS) to individuals with disabilities who would otherwise require institutionalization. These waiver programs are often called 1915(c) waivers (named after the section of the Social Security Act that authorized them), or HCBS waivers. HCBS waiver programs prioritize access to community living and the provision of services in inclusive settings.

Services that may be covered by Medicaid waiver

- Education Coach/Peer Mentor Support
- Career Services
- Tuition and Fees
- Transportation
- Assistive Technology
- Housing and Supports

The federal government allows each state considerable discretion in determining the waiver services it offers. Services used to support postsecondary education can be explicitly authorized in a state waiver

program, or they can be accessed as part of other more broadly defined community-based services.

Each state defines the service elements and activities that are appropriate for its HCBS waiver program. Given this latitude, waiver services vary greatly among states.

POSTSECONDARY SERVICES COVERED BY MEDICAID WAIVER

Medicaid waivers have been used to fund a variety of supports and services for students with ID in PSE, as well as tuition or fees in some cases. Below, we describe some uses of waiver funds and offer examples from specific states.

Education Coach/Peer Mentor.

Peer mentors are usually students enrolled at the college who are recruited, trained, and supervised to provide individualized supports to students with ID. Mentors assist students in learning roles or tasks related to the college environment. Examples include participating in the classroom, getting around campus, building interpersonal skills, and developing independent living skills for dormitory life.

Vermont's HCBS waiver program pays for college peer mentors as part of its Community Supports services. This is an example of a state using a traditional waiver service for postsecondary education. Community Supports usually cover services that assist in developing skills and social supports necessary to promote growth and/or prevent more restrictive levels of care.

Outcomes reported for students graduating from Medicaid waiver-supported college programs in Vermont (2017)

- 86% of all graduates were employed within four months of graduation.
- Wages ranged from \$10 - \$14/hour (min. wage is \$10.50 in VT).
- Five programs had 100% employment at graduation.

Source: Vermont Developmental Disabilities Services Division

While the Vermont definition of Community Supports doesn't specifically mention PSE, the state recognizes the benefits of providing these services to participants on a college campus.

A few states specifically include postsecondary education in their waiver programs. For example, in Pennsylvania, the waiver program includes an Education Support service category, which pays for on-campus peer mentors (up to \$5,000 per semester).

Career Services.

Most state waiver programs provide services to support individuals' employment goals. These services have also been accessed to pay for the career exploration components of a college program. This includes coverage for activities needed to obtain and sustain paid work, such as a coach for a paid job, internship, job shadowing, or other employment experiences.

Waiver employment services can also include support for learning underlying job skills, such as community workplace conduct, attending to tasks, problem solving, workplace safety, and mobility training. Most states have specific Employment Support categories that can be used to cover these services.

Tuition and Fees.

Only a few states currently permit students to use Medicaid waivers for tuition. Pennsylvania's Education Support service allows for the payment of college tuition and fees (there is a lifetime limit of \$35,000 that participants can receive for tuition).

Many states include a waiver service category called Individual Directed Goods and Services. These funds pay for services that address an identified need in an individual's service plan but are not otherwise provided through a waiver. Specific criteria for allowable goods and services are determined by the individual states. In New York, students can use Individual Goods and Services to pay tuition for inclusive college classes. Given its broad definition, this service could be available for college expenses, depending on local interpretations.

Transportation.

Several waiver programs include transportation services from a participant's home to the location of a waiver service. In certain states, students can access this service to fund transportation to college. Some states prioritize services to learn the use of public transportation so that students are also building a skill to increase independence.

Technology.

Many state waiver programs provide assistive technology services. These services may be helpful for college students with ID who need technology supports to fully participate in college classes and campus activities. Examples include providing access to a screen reader or voice-to-text computer software.

Housing Support.

Some waiver programs include supports that assist students with independent living and social skills in

campus housing settings. In Pennsylvania, students use Education Support waiver services for peer mentors in campus residential halls. In California, Community Living services have been used to pay for peer support in college housing. In these programs, Medicaid does not pay the cost of the housing, but covers peer supports and skill development in that setting.

Generally, HCBS waivers do not pay room and board expenses. However, New York recently began a unique pilot program that allows program students to use waiver funding to pay for a portion of their college dorm housing. In addition, students use Live-in Caregiver waiver services to pay for residential mentors. In exchange for paid room and board, student mentors live in the college dorm as roommates with program students.

States have strict rules about what constitutes a residence where waiver services can be provided, and college housing often does not qualify. However, in New York, advocates worked closely with the state to understand specific Medicaid rules (for example, rules requiring an appropriate lease or presence of a kitchen). These and other details that don't easily correlate to college dorms should be addressed through close collaboration with the state.

USING SELF-DIRECTED MEDICAID WAIVER SERVICES TO SUPPORT PSE

Most states allow Medicaid waiver services to be self-directed (also referred to as participant-directed), allowing for greater self-determination and flexibility. Participants who direct their own waiver services work with a service coordinator to choose their services and service providers.

For example, a participant can choose to hire another college student as a peer mentor to provide support required on campus. Working with this peer can enable the student to build relationships with other students on campus and move toward greater campus inclusion.

INITIATING WAIVER SERVICES FOR COLLEGE

With a bit of creativity, most states can use their current Medicaid waiver program to support participation in postsecondary education. Even if a waiver doesn't specifically address PSE, it is likely that existing community-based services could be provided in a college setting.

As a first step, review the HCBS waiver services offered in your state, and identify which services (e.g., adult day services, community supports, community habilitation, employment supports) could support PSE. To learn more about your state's waiver program, the first step is to review the state waivers. The federal Center for Medicare & Medicaid Services (CMS) maintains a searchable database of waiver applications, which describe each state's programs in detail. The database is accessible by the public to review and download copies of the waivers.

Reading your state's 1915(c) waivers will provide valuable information about your state's waiver program, including detailed definitions of the services provided in Appendix C to the waiver form. [The database is available here.](#) Filter your search for approved 1915(c) waivers.

Some states may want to amend their federal waiver program applications to add a category for Education Support and specify postsecondary education as a covered service. This can be done at any time. CMS provides an application for state Medicaid agencies to submit a state plan amendment. Changes can also be made when a waiver is up for renewal.

Although amending a waiver is not necessary to add Education Support services, some states have done so to explicitly cover services such as mentors, tuition, and fees. In this way, a state can be very specific in describing the parameters of the support it will provide.

For example, both New York and Pennsylvania require that a student must attend inclusive classes. The Pennsylvania service definition also specifies that students take a minimum of six credit hours per semester, and that students have an employment outcome in their service plan. The definition also excludes some expenses, such as room and board.

Colleges can apply to become an authorized Medicaid provider, although this is a difficult process to initiate. Universities that provide public services, for example, through clinics or employment services, may already be qualified Medicaid providers. In this case, it might be easier for a program for students with ID to access Medicaid funding.

Alternatively, some states will allow a college to become a vendor for another authorized Medicaid agency. This process differs in each state but is generally easier than applying to be an authorized Medicaid provider. Another option is for a college to partner with an authorized Medicaid provider to access services.

Since rules vary, it's best for colleges and state agencies to work together to determine the most efficient way to address this issue.

COLLABORATING FOR SUCCESS

The provision of Medicaid waiver services to support PSE will require collaboration. Experiences in several states have demonstrated the importance of colleges, disability advocacy groups, state agencies, and Medicaid providers working together to build support for waiver-funded college activities. Stakeholders can share resources, strategies, and data collection tools, promote awareness of programs, and advocate with funders.

It is also important to identify individuals at the college, in state agencies, and in the disability community who will champion the cause within their organizations. People with experience in Medicaid and/or the disability community can be particularly effective in leading efforts to use waivers for college.

The University of North Carolina Greensboro has been providing Medicaid supported services to students with ID since 2008. For the provision of these services, it chose to partner with an established Medicaid agency. Using a Request for Proposal process, the school selected Monarch, a nonprofit organization that provides comprehensive services and supports to people with ID. Monarch had a long history in the field as well as an established relationship with the college as an outside provider of supported employment services.

One message to be shared when engaging stakeholder groups is that college for people with ID aligns with public policy goals and delivers the outcomes intended by the HCBS waiver statute. These outcomes include increased employment, greater participation in the community, relationships with peers, independent living, and a greater sense of dignity and self-reliance.

FOR MORE INFORMATION

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INSIGHT, Issue No. 40, 2019

INSIGHT is a publication of Think College, a project of the Institute for Community Inclusion at the University of Massachusetts Boston, funded by a grant from the Office of Postsecondary Education (Grant No. P407B100002). The opinions contained in this document are those of the grantee and do not necessarily reflect those of the funder.

Recommended citation for this brief: Parisi, P. & Landau, J. (2019). *Use of Medicaid Waivers to Support Students with Intellectual Disability in College*. Think College Insight Brief, Issue No. 40. Boston, MA: University of Massachusetts Boston, Institute for Community Inclusion.

ACKNOWLEDGEMENT

The authors would like to acknowledge the important contribution of extensive research conducted by Odgerel Dashzeveg, MA, and Ph.D candidate at the School for Global Inclusion and Social Development, University of Massachusetts Boston.

