

Medicaid HCBS Waiver Support for Students with Intellectual Disability Attending College: What's Available in Your State?

By Paige Parisi and Julia Landau

Medicaid Home and Community Based Services (HCBS) waivers can provide support for individuals with intellectual disability participating in postsecondary education (PSE). HCBS waiver funding has been used to pay for peer support, career services, transportation, tuition, fees, and more (Parisi & Landau 2018).

To determine if HCBS waiver funds can be used for PSE in a particular state, first check with the state developmental disabilities (DD) agency. A full listing by state of DD agencies can be found here. www.nasddd.org/state-agencies/

If participation in PSE is not explicitly mentioned as part of a HCBS waiver program, coverage may still be possible. Most HCBS waiver programs cover services that support participation in PSE, although it may require negotiation and discussion to consider their use in the college setting. For example, almost all state HCBS waiver programs offer services related to community living and employment-related services. These services have been used to cover peer coaches and the career development components of PSE programs, respectively. These are both central aspects of PSE for students with ID and share fundamental goals with HCBS waiver programs.

HOW TO ACCESS INFORMATION ON STATE HCBS WAIVER PROGRAMS

As a first step in determining the range of HCBS services offered, locate information about each state's HCBS waiver programs online from the federal Medicaid website. www.medicaid.gov/medicaid/section-1115-demo/demonstration-and-waiver-list/index.html?sl=yes

The site provides three search filters:

- **State**
- **Waiver Authority**
- **Waiver Status**

As boxes are checked in these three categories, a dynamic list of state waiver programs is refined accordingly.

Waiver Authority:

Select 1915(c) as the waiver authority in the search, unless you are searching in Arizona, Rhode Island, or Vermont. HCBS Medicaid waivers were added to the Medicaid law under section 1915(c), which is known as the Medicaid "waiver authority."

All but three states have a 1915(c) waiver program. Arizona, Rhode Island, and Vermont currently provide HCBS services to people with ID under Section 1115 of the Medicaid law, and do not use 1915(c) waivers. The 1115 waiver authority plans, which can be found on the same website, give states additional flexibility to demonstrate specific policy approaches for improving services to Medicaid populations.

Waiver Status: Limit the search to approved and pending waivers only. Pending waivers are applications that have been submitted to the federal government and are pending approval. Since waiver programs typically have a five-year term, there may be few or, at times, no pending waivers. Pending waivers generally contain the same information as an approved waiver. Effective dates of pending waivers should be validated by confirming that the waiver status has changed to Approved as of the proposed effective date, which is listed on page one, section one of the online waiver document.

Once the search is refined, depending on the state, the results could yield as many as 20 HCBS waiver programs. Smaller states usually have fewer programs.

Home and community based services (HCBS) provide opportunities for Medicaid beneficiaries to receive services in their own home or community rather than institutions or other isolated settings.

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Each HCBS waiver program has a title that generally describes the purpose and population of the waiver program. In order to see the individual services covered under each program, click on the title that most likely covers adults with ID and other developmental disabilities. The subsequent Waiver Description link will further include descriptions of services provided under every HCBS waiver program in that state. This will help determine the HCBS waiver program(s) best suited for PSE in the state.

Once a HCBS waiver program has been identified for review, click the waiver application link to open an .htm file in your browser. Although this is not as user friendly as a typical Word or PDF document, it can be managed and navigated.

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HOW TO REVIEW STATE HCBS WAIVER PROGRAMS
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The first section of a HCBS waiver document contains basic information such as program title, whether the waiver is new or an amendment, effective date, the number of years the program will exist and a brief description of the waiver.

While it is generally helpful to become familiar with the entire document, key information to read first is the section entitled Participant Services. This is an appendix and can be quickly located by searching the term Appendix C: (it’s important to include the colon in your search). The search will take you directly to Appendix C and the table, Summary of Services Covered.

Review the list of services in the table to identify supports that might be applicable to participation in PSE, as discussed further below. Use the computer search function or scroll through the document to find more details on particular services.

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HOW TO DETERMINE WHICH WAIVER SERVICES CAN SUPPORT PSE
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The type and scope of HCBS waiver programs vary greatly among states. Careful reading of a HCBS waiver document is necessary since there are many options for covering services. HCBS waiver programs can cover any service that assists individuals to avoid institutionalization and function in the community, so long as the service is cost-neutral compared to institutionalization.

It is likely that services exist in current HCBS waiver programs that can be used to cover a range of PSE

expenses because they are the same types of services waiver participants already use in other community, non-college settings. For example, a common support used by college students with ID is peer support. College peers can support students with ID in all aspects of campus life, such as classroom participation, engagement in social activities, and managing campus logistics. Peer support can be provided through a variety of HCBS waiver services. In the District of Columbia (starting in 2020) and Pennsylvania, peer support is covered under Education Support Services. Other state waiver programs cover PSE peer support as Community Living Support, Day or Community Habilitation, or Community Networking services.

HCBS waiver Employment Support, Prevocational and Career Planning services cover a variety of employment-related activities. These services can be used in the college setting to support students with ID.

Most HCBS waiver programs also have Individual Directed Goods and Services (IDGS), which address a need in an individual’s service plan not otherwise provided through the waiver. In NY, students with self-directed HCBS waiver program funding (discussed below) use IDGS for tuition for noncredit classes that meet the definition of a community class, as well as for related books, seminars, and student advising.

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HOW TO DETERMINE WHAT SERVICES CAN BE SELF-DIRECTED
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As Medicaid’s role in furnishing HCBS has expanded over time, self-directed services have emerged as a key element in enabling participants to maximize independence and self-determination. Self-directed delivery models allow participants to choose the services and service providers that best align with their goals and interests.

Nearly all states allow participants in at least one of its HCBS waiver programs to self-direct services (also known as participant-directed services). With self-directed services, participants choose their own HCBS waiver program services and direct their funding to accomplish personally identified goals. If available, this is often a good option for students who want to use waiver funding for PSE.

When reading about a service in Appendix C of a waiver, after the “Service Description (Scope)” there is a

Self-directed services are often the easiest way for students to use waiver funding for postsecondary education.

How to Find and Read 1915(c) Waiver Applications

1. Go to the Medicaid State Waiver Website
2. Select a state
3. Select 1915(c) Waiver Authority
4. Select Approved and Pending waivers
5. Choose a relevant title from the state's waiver programs
6. Review Waiver Description
7. Open the appropriate waiver application
8. Search Appendix: C "Summary of Services Covered"
9. Review services that support PSE

statement about whether the service delivery method is Participant-Directed, Provider-Managed, or both. Note which services that might support PSE can be participant-directed.

Participant or self-directed services are not intended to replace agency services. Instead, they provide an alternative for those who want one. For example, non-professional staff are often better suited for certain supports, such as peer coaches. The flexibility of self-directed services makes it an attractive option for PSE participation.

OBTAINING PSE SUPPORTS AND SERVICES FROM AN APPROVED MEDICAID PROVIDER

Providers of self-directed services such as peer coaches can generally receive Medicaid reimbursement without going through a process that involves the educational institution. However, services that are not self-directed must be obtained through an approved Medicaid provider agency.

A college can apply to be an approved Medicaid provider, but this has proven to be a long and challenging process in most states. Medicaid providers are traditionally medical facilities, which can create a number of obstacles for colleges. Some states take a narrower view. In Ohio, the PSE program at the University of Cincinnati applied for and became a certified Medicaid agency provider of HCBS Adult Day Services, a specific Medicaid service listed in the HCBS waiver. The program can now be reimbursed for the services it provides to eligible students, such as employment activities, transportation, residential aid, and health and recreation support.

In several states, PSE programs can qualify to be a vendor for another existing Medicaid provider. This can be an easier process. For example, PSE programs in California, Pennsylvania, and Vermont have provided HCBS waiver supports under a vendor agreement with a regional or county Medicaid provider.

The University of North Carolina Greensboro used another structure and formed a separate non-profit provider agency that was approved by Medicaid and served the university PSE program exclusively. Over time, the entity proved too small to keep up with the demands of being an endorsed Medicaid provider. UNCG then partnered with an established Medicaid provider in the community through an RFP process. In addition to providing student support services, this external partner also does all Medicaid billing for the program.

The University of Delaware's program for students with ID, the Career and Life Studies Certificate (CLSC), found a path within its own campus. CLSC is part of the University's Center for Excellence in Developmental Disabilities (UCEDD), which is a provider of Medicaid adult community employment services. As a result, eligible CLSC students can obtain access to HCBS waiver funding to cover some program fees. This might be a path for other PSE programs at colleges or universities that have a UCEDD. There is at least one UCEDD in every state. www.aucd.org/directory/directory.cfm?program=UCEDD

If the UCEDD is not a Medicaid provider, another campus program that provides Medicaid-reimbursed services could be a partner, such as a health clinic that provides physical or speech therapy.

These examples are just some of the ways PSE programs connect with Medicaid to help support students with HCBS waivers. If a student is not utilizing self-directed funds, then they will need to find a mechanism to obtain services from a Medicaid provider that can support them in college. Each state is unique and each solution will be unique as well.

Examples of how HCBS waiver programs support students with ID in PSE

1. Student has self-directed funding
2. College becomes approved Medicaid provider
3. PSE program becomes approved Medicaid provider
4. College becomes a vendor of a local Medicaid provider
5. PSE program connects with campus UCEDD or other campus-based Medicaid provider

CONCLUSION

There are several avenues available to pursue HCBS waiver funding for PSE. Many state Medicaid agencies will cover PSE because it provides the same types of services HCBS waiver participants currently receive in other settings. It may take a while to get comfortable working with the online Medicaid State Waiver List and the HCBS waiver documents, but they are potentially vital resources for PSE programs that serve students with ID.

While the situation varies by state, there is much to be learned by the strategies utilized in states that currently use Medicaid waivers to support PSE. For example, some states have contacted officials in the Pennsylvania Department of Human Services Office of Developmental Programs to learn about the strategies they use to offer robust HCBS waiver Education Support services. The District of Columbia looked to Pennsylvania as a model for the Education Support services they plan to include in new waiver funding to be launched in 2020.

It's also beneficial to build relationships with the state developmental disabilities agency and network with local advocacy groups. If PSE stakeholders understand their state HCBS waiver programs, they can put PSE in context with goals that they have in common, e.g., employment and community inclusion. Such framing can help states better understand how PSE programs for people with ID deliver the outcomes envisioned for HCBS, including increased employment, greater participation in the community, relationships with peers, independent living, and a greater sense of dignity and self-reliance.

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