



June 21, 2021

Dawn Landry, Medicaid Policy Administrator
NH Department of Health and Human Services
Division of Medicaid Services
129 Pleasant Street
Concord, NH 03301

Re: 1915i Supportive Housing State Plan Amendment

Administrator Landry:

Housing Action NH is a statewide coalition of 80 organizations working to improve state and federal policy so everyone in New Hampshire has a place to call home. Our members include organizations that develop, manage and finance affordable housing, supportive housing providers and homeless service agencies. We are writing to express our strong support for the submission of the 1915(i) Medicaid state plan amendment (SPA) to offer housing consultation and housing stabilization services to Medicaid enrollees with disabilities who are experiencing or at risk of experiencing homelessness and to offer comments on important parameters for successful service implementation.

Populations Clearly Identified and Aligned with Strategic Outcomes

Housing Action NH supports the targeted populations in the draft 1915i SPA. Those identified are the most likely to benefit from housing consultation and stabilization and improved health outcomes. In addition, the housing services for these populations are not covered by any other Medicaid benefit or funding streams. Finally, the focus on this vulnerable population aligns with the recently updated plan to address the overall concerning increase in homelessness.

Array of Services Address Sustaining Housing

Housing Action NH supports the SPA's outline of the array of housing related services. In addition, we applaud the clinical justification opportunity to continue housing sustaining services over the proposed 150 hours cap if necessary. This is an important step to curbing chronic and recurring homelessness.

Eligible Agencies and Payment Parameters Need Clarification

Since payment parameters are not addressed in the proposed SPA, Housing Action NH encourages NH DHHS to consider all of the entities currently providing housing advocacy, housing consultation and housing stabilization services. We encourage the Department to include all supportive housing, transitional housing, and homeless service providers, including small shelters, and shelters operating outside of state funded contracts, since these are the agencies with close, trusted relationships with the targeted populations. We also urge the Department to not exclude housing with shared living spaces and/or common areas.

Payment mechanisms, such as per-member-per-month or per diem, also need to be identified. The role of New Hampshire's Managed Care Organizations (MCO) should also be addressed. While we support MCOs role in housing stability, the housing services of MCOs should not supplant those of homeless service agencies, supportive housing providers, or transitional housing providers.

Thank you for the opportunity to provide comment. Housing Action NH offers its partnership to NH DHHS to assist with successful implementation.

Very best regards,

A handwritten signature in black ink, appearing to read 'Elissa Margolin', written in a cursive style.

Elissa Margolin
Director
Housing Action NH
PO Box 162
Concord, NH 03302
www.housingactionnh.org
elissa@housingactionnh.org