

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop: S2-25-26
Baltimore, Maryland 21244-1850



State Demonstrations Group

October 20, 2023

Jay Ludlam
Deputy Secretary for North Carolina Medicaid
North Carolina Department of Health and Human Services
2001 Mail Service Center
Raleigh, NC 27699-2001

Dear Deputy Secretary Ludlam:

The Centers for Medicare & Medicaid Services (CMS) is approving an update to Attachment G for North Carolina's section 1115(a) demonstration titled, "North Carolina Medicaid Reform Demonstration" (Project Number 11-W-00313/4 and 21-W-00070/4). Attachment G outlines the needs-based criterion and risk factors used to determine eligibility for the Healthy Opportunities Pilot (HOP). A copy of Attachment G is enclosed and will be incorporated in the special terms and conditions (STC). This attachment will remain in effect throughout the demonstration approval period, which is set to expire October 31, 2024.

The North Carolina Medicaid Reform Demonstration authorizes the HOP which provide evidence-based interventions addressing housing instability, transportation insecurity, food insecurity and interpersonal safety and toxic stress for Medicaid beneficiaries who meet specified needs-based criteria. The needs-based eligibility criteria outlined in Attachment G was updated to add intellectual or developmental disability (I/DD), traumatic brain injury (TBI), and clinical eligibility criteria for Tailored Care Management (North Carolina's Health Home benefit, SPA 22-0024) as qualifying criteria for adults, pregnant women, and children 0-20.

If you have any questions, please contact your project officer, Ms. Shelby Higgins. Ms. Higgins can be reached at (443) 926-6513, or by email at Shelby.Higgins@cms.hhs.gov. We look forward to our continued collaboration on the North Carolina section 1115 demonstration.

Sincerely,

Angela D. Garner
Director

Division of System Reform Demonstrations

Enclosure

cc: Morlan Lannaman, State Monitoring Lead, Medicaid and CHIP Operations Group

Attachment G: Healthy Opportunities Pilots Eligibility and Services

Beneficiaries eligible for Healthy Opportunities Pilots services (as described in Table 3) must be eligible for the services via STC 21(T)(i) and meet at least one needs-based criteria (as described in Table 1) and at least one risk factor (as described in Table 2). The state can request changes to Attachment G over the course of the demonstration and CMS will review and approve (if appropriate) all changes within 45 days from submission.

Eligible Enrollees

Table 1: Needs-Based Criteria

Eligibility Category	Age	Needs-Based Criteria (at least one, per eligibility category)
Adults	21+	<ul style="list-style-type: none"> • 2 or more chronic conditions. Chronic conditions that qualify an individual for pilot enrollment include: BMI over 25, blindness, chronic cardiovascular disease, chronic pulmonary disease, congenital anomalies, chronic disease of the alimentary system, substance use disorder, chronic endocrine, cognitive conditions, chronic musculoskeletal conditions, chronic mental illness, chronic neurological disease, chronic infectious disease, cancer, autoimmune disorders, chronic liver disease, chronic renal failure, intellectual or developmental disability (I/DD), and traumatic brain injury (TBI). • Meets the clinical eligibility criteria for Tailored Care Management, North Carolina’s Health Home benefit (SPA 22-0024)¹ • Repeated incidents of emergency department use (defined as more than four visits per year) or hospital admissions. • Former placement in North Carolina’s foster care or kinship placement system. • Previously experienced three or more categories of adverse childhood experiences (ACEs).

¹ Individuals are eligible for Tailored Care Management if they have one serious and persistent mental health condition, I/DD, TBI, or severe substance use disorder, as defined further in North Carolina’s approved SPA.

Pregnant Women	n/a	<ul style="list-style-type: none"> • Multifetal gestation • Chronic condition likely to complicate pregnancy, including hypertension and mental illness • Current or recent (month prior to learning of pregnancy) use of drugs or heavy alcohol • Adolescent ≤ 15 years of age • Advanced maternal age, ≥ 40 years of age • Less than one year since last delivery • History of poor birth outcome including: preterm birth, low birth weight, fetal death, neonatal death • Former or current placement in NC's foster care or kinship placement system • Previously experienced or currently experiencing three or more categories of ACEs • Intellectual or developmental disability (I/DD) • Traumatic brain injury (TBI) • Meets the clinical eligibility criteria for Tailored Care Management, North Carolina's Health Home benefit (SPA 22-0024)
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Children	0-3	<ul style="list-style-type: none"> • Neonatal intensive care unit graduate • Neonatal Abstinence Syndrome • Prematurity, defined by births that occur at or before 36 completed weeks gestation • Low birth weight, defined as weighing less than 2500 grams or 5 pounds 8 ounces upon birth • Positive maternal depression screen at an infant well-visit
	0-20	<ul style="list-style-type: none"> • One or more significant uncontrolled chronic conditions or one or more controlled chronic conditions that have a high risk of becoming uncontrolled due to unmet social need, including: asthma, diabetes, underweight or overweight/obesity as defined by having a BMI of $<5^{\text{th}}$ or $>85^{\text{th}}$ percentile for age and gender, developmental delay, cognitive impairment, substance use disorder, behavioral/mental health diagnosis (including a diagnosis under DC: 0-5), attention-deficit/hyperactivity disorder, cancer, autoimmune diseases, learning disorders, intellectual or developmental disability (I/DD), and traumatic brain injury (TBI). • Meets the clinical eligibility criteria for Tailored Care Management, North Carolina's Health Home benefit (SPA 22-0024) • Experiencing or previously experienced three or more categories of adverse childhood experiences (e.g. Psychological, Physical, or Sexual Abuse, or Household dysfunction related to substance abuse, mental illness, parental violence, criminal behavioral in household) • Enrolled or formerly enrolled in North Carolina's foster care or kinship placement system

Table 2: Risk Factors

Risk Factor	Definition
Homelessness or housing insecurity	Homelessness, as defined in 42 C.F.R. § 254b(h)(5)(A), or housing insecurity, as defined based on the principles in the questions used to establish housing insecurity in the Accountable Health Communities Health Related Screening Tool or the North Carolina Social Determinants of Health (SDOH) screening tool. ^{2,3}
Food insecurity	<p>As defined by the US Department of Agriculture commissioned report on Food Insecurity in America:⁴</p> <ul style="list-style-type: none"> • Low Food Security: reports of reduced quality, variety, or desirability of diet. Little or no indication of reduced food intake. • Very low food security: Reports of multiple indications of disrupted eating patterns and reduced food intake <p>Or food insecure as defined based on the principles in the questions used to establish food insecurity in the North Carolina Social Determinants of Health (SDOH) screening tool.⁵</p>
Transportation insecurity	Defined based on the principles in the questions used to establish transportation insecurities in the Accountable Health Communities Health Related Screening Tool or the North Carolina SDOH screening tool. ⁶
At risk of, witnessing, or experiencing interpersonal violence	Defined based on the principles in the questions used to establish interpersonal violence in the Accountable Health Communities Health Related Screening Tool or the North Carolina SDOH screening tool. ⁷

² The Accountable Health Communities Health-Related Social Needs Screening Tool. Available <https://innovation.cms.gov/files/worksheets/ahcm-screeningtool.pdf>.

³ North Carolina’s SDOH Screening Questions. Available: <https://www.ncdhhs.gov/about/department-initiatives/healthy-opportunities/screening-questions>

⁴ USDA Economic Research Service [Internet]. Washington: USDA Economic Research Service; [updated 2017 Nov 27]. Definitions of Food Insecurity; [updated 2017 Oct 4; cited 2017 Nov 27]. Available from: <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/definitions-of-food-security/>

⁵ North Carolina SDOH Screening Tool. Available: <https://www.ncdhhs.gov/about/department-initiatives/healthy-opportunities/screening-questions>

⁶ *Ibid*

⁷ *Ibid*.

Healthy Opportunities Pilots Services

Table 3: Healthy Opportunities Pilots Services

Service Sub-Category	Healthy Opportunities Pilots Services
Housing	
Tenancy Support and Sustaining Services	<ul style="list-style-type: none"> • Assisting the individual with identifying preferences related to housing (e.g., type, location, living alone or with someone else, identifying a roommate, accommodations needed, or other important preferences) and needs for support to maintain community integration. • Supports to assist the individual in budgeting for housing/living expenses, including financial literacy education on budget basics and locating community based consumer credit counseling bureaus. • Assisting the individual to connect with social services to help with finding housing necessary to support individual in meeting their medical care needs. This pilot service is furnished only to the extent it is reasonable and necessary as clearly identified through an enrollee’s care plan. • Assisting the individual with housing application and selection process, including filling out housing applications and obtaining and submitting appropriate documentation. • Assisting the individual to develop a housing support plan based on the functional needs assessment, including establishing measurable goal(s) as part of the overall person centered plan. • Developing a crisis plan for an individual, which must identify prevention and early intervention services if housing is jeopardized. • Participating in the person centered plan meetings to assist the individual in determination or with revisions to housing support plan. • Assisting the individual to review, update and modify his or her housing support and crisis plan on a regular basis to reflect current needs and address existing or recurring housing retention barriers. • Assisting the individual to complete reasonable accommodation requests as needed to obtain housing. • Supporting individuals in the development of independent living skills, such as skills coaching, financial counseling and anger management. • Connecting the individual to education and training on tenants’ and landlords’ role, rights, and responsibilities. • Assisting in reducing risk of eviction by providing services such as services that help the individual improve his or her conflict resolution skills, coaching, role-playing and communication strategies targeted towards resolving disputes with landlords and neighbors; communicate with landlords and neighbors to reduce the risk of eviction; address biopsychosocial behaviors that put housing at risk; and provide ongoing support with activities related to household management.

	<ul style="list-style-type: none"> • Assessing potential health risks to ensure living environment is not adversely affecting an individual’s health. • Providing services that will assist the individual with moving into stable housing, including arranging the move, assessing the unit’s and individual’s readiness for move-in, and providing assistance (excluding financial assistance) in obtaining furniture and essential household items. This pilot service and the assistance and items furnished under this service are coverable only to the extent they are reasonable and necessary as clearly identified through an individual’s care plan and the individual is unable to meet such expense or when the services cannot be obtained from other sources. • Providing funding related to utility set-up and moving costs provided that such funding is not available through any other program. This pilot service is furnished only to the extent it is reasonable and necessary as clearly identified through an individual’s care plan and the individual is unable to meet such expense or when the services cannot be obtained from other sources.
Housing Quality and Safety Improvement Services	<ul style="list-style-type: none"> • Repairs or remediation for issues such as mold or pest infestation if repair or remediation provides a cost-effective method of addressing an individual’s health condition, as documented by a health care professional, and remediation is not covered under any other program or provision of law, such as tenancy law. This pilot service is furnished only to the extent it is reasonable and necessary as clearly identified through an individual’s care plan and the individual is unable to meet such expense or when the services cannot be obtained from other sources. • Modifications to improve accessibility of housing (e.g., ramps, rails) and safety (e.g., grip bars in bathtubs) when necessary to ensure an individual’s health and the modification is not covered under any other provision such as the Americans with Disabilities Act.
Legal Assistance	<ul style="list-style-type: none"> • Assistance with connecting the individual to expert community resources to address legal issues impacting housing and thereby adversely impacting health, such as assistance with breaking a lease due to unhealthy living conditions. This pilot service does not include legal representation or payment for legal representation.
Securing House Payments	<ul style="list-style-type: none"> • Provide a one-time payment for an individual’s security deposit and first month’s rent provided that such funding is not available through any other program. This payment may only be made once for each individual during the life of the demonstration, except for state determined extraordinary circumstances such as a natural disaster. This pilot service is furnished only to the extent it is reasonable and necessary as clearly identified through an individual’s care plan and the individual is unable to meet such expense or when the services cannot be obtained from other sources.

Short-Term Post- Hospitalization	<ul style="list-style-type: none">• Post-hospitalization housing for short-term period, not to exceed six [6] months, due to individual's imminent homelessness provided that such a service is not available under any other programs. Temporary housing may not be in a congregate setting. To the extent temporary housing services are available under other programs, this service could cover connecting the individual to such program and helping them secure housing through that program.
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Food	
Food Support Services	<ul style="list-style-type: none"> • Assist the individual with applications for SNAP and WIC. • Assist the individual with identifying and accessing school based food programs. • Assist the individual with locating and referring individuals to food banks or community-based summer and after-school food programs. • Nutrition counseling and education for the individual, including on healthy meal preparation. • Providing funding for meal and food support from food banks or other community based food programs, including funding for the preparation, accessibility to, and food for medical condition specific “healthy food boxes” for the individual, provided that such supports are not available through any other program. Meal and food support services must be provided according to the individual’s care plan and must not constitute a “full nutritional regimen” (three meals per day per person).
Meal Delivery Services	<ul style="list-style-type: none"> • Providing funding for targeted nutritious food or meal delivery services for individuals with medical or medically-related special dietary needs provided such funding cannot be obtained through any other source. Meals provided as part of this service must be provided according to the enrollee’s care plan and must not constitute a “full nutritional regimen” (three meals per day, per person).
Transportation	
Non-emergency health-related transportation	<ul style="list-style-type: none"> • Transportation services to social services that promote community involvement for the individual. • Providing educational assistance to the individual in gaining access to public or mass transit, including access locations, pilot services available via public transportation, and how to purchase transportation passes. • Providing payment for public transportation (i.e., bus passes or mass transit vouchers) to support the individual’s ability to access pilot services and other community-based and social services, in accordance with the individual’s care plan. • Providing account credits for cost-effective private forms of transportation (taxi, ridesharing) in areas without access to public transit. Pilot transportation services must be offered in accordance with an individual’s care plan, and transportation services will not replace non-emergency medical transportation as required under 42 CFR 431.53. Whenever possible, the individual will utilize family, neighbors, friends, or community agencies to provide transportation services.
Interpersonal Violence (IPV)/Toxic Stress	
Interpersonal Violence-Related Transportation	<ul style="list-style-type: none"> • Transportation services to/from IPV service providers for individuals transitioning out of a traumatic situation.

<p>IPV and Parenting</p>	<ul style="list-style-type: none"> • Assistance with linkages for individuals transitioning out of a traumatic situation to community-based social service and mental health agencies with IPV expertise.
<p>Support Resources</p>	<ul style="list-style-type: none"> • Assistance with linking the individual to high quality child care and after-school programs. • Assistance with linkages to programs that increase adults' capacity to participate in community involvement activities. • Providing navigational services focusing on identifying and improving existing factors posing a risk to the safety and health of victims transitioning out of traumatic situations (i.e., obtaining a new phone number, updating mailing addresses, securing immediate shelter and longer-term housing, school arrangements to minimize disruption of school schedule, connecting enrollees to medical-legal partnerships to address overlap between healthcare and legal needs).
<p>Legal Assistance</p>	<ul style="list-style-type: none"> • Assistance with directing the individual to available legal services within the legal system for interpersonal violence related issues, such as securing a Domestic Violence Protection Order. This pilot service does not include legal representation or payment for legal representation.
<p>Child-Parent Support</p>	<ul style="list-style-type: none"> • Evidence-based parenting support programs (i.e., Triple P – Positive Parenting Program, the Incredible Years, and Circle of Security International). • Evidence-based Maternal, Infant, and Early Home Visiting services to promote enhanced health outcomes, whole person care and community integration. • Dyadic therapy treatment for children and adolescents at risk for or with an attachment disorder, or as a diagnostic tool to determine an attachment disorder.