

Foundational Community Supports (FCS) service supplanting guidance

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FCS services are meant to build upon and enhance existing services, prioritizing populations who would otherwise struggle to access housing or employment through other programs. FCS pays for supportive housing and supported employment services when **no other public funds** are already dedicated to providing comparable services to the participant. Comparable services are defined as those consistent with the intent and scope of the FCS supportive housing or supported employment benefits (see the [FCS Provider Manual](#) for service descriptions).

Supplanting resources is enrolling an individual in FCS services to replace funding for services that are **already** being delivered to a **current** supportive housing or supported employment participant. This is not allowed because Medicaid is a payer of last resort.

Supportive housing

For **new or future** participants not yet receiving any comparable services, eligible individuals can enroll in supportive housing services.

FCS serves people who are already receiving minimal housing case management services (such as housing and essential needs) whose housing stability and health would benefit from receiving supportive housing services.

An individual must meet FCS eligibility criteria and be authorized by Amerigroup (third-party administrator) before receiving FCS services. This is not supplanting resources because FCS is not replacing comparable services; rather, FCS is enhancing services that are not adequately meeting the participant's needs.

Allowable resource coordination

Supported employment

For **new or future** participants not yet receiving any comparable services, eligible individuals can enroll in supported employment services.

FCS can be braided with services offered through the Department of Social and Health Services Division of Vocational Rehabilitation (DVR). See the [DVR and FCS fact sheet](#) for additional guidance. However, the same participant cannot receive the same type of DVR and FCS employment services at the same time.

A participant must be authorized by Amerigroup (third-party administrator) before receiving FCS services, and a DVR counselor must approve employment goals and an employment plan before DVR services are provided.

FCS and Indian Health Service (IHS)

There is one exception to FCS resource supplanting rules: for tribal populations, services offered by IHS are considered to be the payer of last resort, even after Medicaid services.