

Foundational Community Supports (FCS) Supplanting vs. Supplementing

i This is a tool for providers to determine if supplantation is likely and requires further investigation. HCA is not responsible for this determination.

Foundational Community Supports (FCS) services are federally-funded Medicaid reimbursable services that are part of Washington State’s Section 1115 Medicaid Transformation Project (MTP) waiver.

FCS pays for supportive housing and supported employment services when no other public funds are already dedicated to providing comparable services to the participant.

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. For more supplantation guidance, review **FCS service supplanting guidance**.

Supplementing services are defined as enhancing current services to go above and beyond what is already being offered.

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.

For example, 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.

Note: 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.

When supplementation is likely

Supplementation is likely if **at least one** of the following is true:

- The participant is **not** receiving services comparable to HCA’s FCS Supportive Housing and/or FCS Supported Employment services
- The comparable housing and/or employment support services time is limited*
- The comparable services provided are less frequent than the FCS services (i.e. fewer service units per authorization period)*
- Services will be provided by FCS that wouldn’t be received by the participant without FCS (i.e. care coordination, housing or employment search)*
- Funding sources other than FCS will **not** be used to pay staff wages for those who also serve people with FCS services
- There is a clear difference between FCS revenue and revenue coming from other service funding sources (i.e. revenue is kept in separate bank accounts)

When supplantation is likely

Potential **supplantation** is likely if **none** of the supplementation conditions are true.

- The participant is receiving services comparable to HCA’s FCS Supportive Housing and/or FCS Supported Employment services
- The comparable housing and/or employment support services has no time limit*
- The comparable services provided are the same or more frequent than the FCS services
- Services will be provided regardless of FCS enrolment (i.e. care coordination, housing or employment search)*
- Other funding will be utilized to pay staff wages for those who also serve FCS enrollees
- There is not a clear difference between FCS revenue and revenue coming from other service funding sources (i.e. revenue is kept in separate bank accounts and is clearly defined within policy and procedure)

*See **FCS Provider Manual** for details.