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BuildingChanges.org

October 1, 2015

Victoria Wachino
Director
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
200 Independence Ave SW
Washington, DC 20201

Dear Ms. Wachino,

I am writing in enthusiastic support of Washington State's Medicaid Transformation Waiver Application. We applaud Washington State leaders for proposing such bold steps to reform our health systems and recognizing that health starts where we live, learn, work, and play. We are particularly interested in Initiative 1: Transformation through Accountable Communities of Health and Initiative 3: Foundational Community Supports including Supportive Housing and Supported Employment. These initiatives will support the populations we are focused on to have a home, a good job, and live healthy lives and will produce a positive return on investment.

Building Changes is an intermediary committed to seeding and nurturing long-term solutions to homelessness in Washington State. Implementing these solutions requires new approaches and changes to the systems that serve our most vulnerable populations. We administer the Washington Youth and Families Fund, a public-private partnership that funds services in housing for homeless youth and families. We build capacity among housing and homelessness providers to work across sectors including with health care systems.

Initiative 1: Transformation through Accountable Communities of Health

As an intermediary focused on building bridges between systems, we recognize the importance of having structures dedicated to this purpose. We have participated and funded Technical Assistance to the ACH regions in the start-up phase over the last two years as a member of the Health Philanthropy Partners. We support the role of ACHs to coordinate innovative projects that bring multiple systems to bear to address pressing community health priorities. Each ACH region currently has a representative from the local housing and homelessness community. These representatives will help ensure that housing, a key social determinant of health, is incorporated into local strategies. We also recommend that each ACH's governing body reflects the demographics of the community, in particular, racial and ethnic groups experiencing disparities in health access and outcomes.

Initiative 3: Foundational Community Supports

Supportive Housing: We enthusiastically support the inclusion of benefits for Supportive Housing and Supported Employment and encourage you to approve benefit scopes that are adequate to meet the needs of a highly complex population with multiple co-morbidities, trauma exposure, and behaviors that pose barriers to housing stability. Washington State is a national leader in providing Permanent Supportive Housing to medically vulnerable populations. We have many skilled providers

with long track records of providing these services in coordination with physical and behavioral health providers.

Since 2008, Building Changes has funded Permanent Supportive Housing for families recovering from multiple barriers including chronic homelessness, multiple co-morbid health conditions, trauma, and child welfare system involvement. We have conducted a rigorous evaluation of the 20 funded programs at 14 agencies which has demonstrated improvements in families' housing stability, family reunification and access to physical and behavioral health servicesⁱ. The evaluation is ongoing and will involve further analysis of cost impacts. We will continue to share the findings with our partners in state government to better understand which families benefit most from this intervention and which specific service models produce the most positive return on investment.

Over the last several decades and fueled by the federal HEARTH Actⁱⁱ, communities across Washington State have worked to streamline both the funding and intake processes for homeless housing. All communities were required by both the federal governmentⁱⁱⁱ and Washington State Department of Commerce^{iv} to have a Coordinated Entry system as of January, 2015. These existing systems will support rapid implementation of the new Supportive Housing benefit by providing an existing mechanism for identification, outreach, and enrollment of eligible individuals.

Supported Employment: Building Changes has a long history of supporting homelessness programs to include an emphasis on employment. We are currently partnering with the Washington State Department of Social and Health Services on a Supported Employment pilot program in Snohomish County targeting homeless heads of household with behavioral health disorders. We look forward to using what we learn from this program to inform broader use of Supported Employment with homeless or at-risk individuals with behavioral health conditions across the state.

General Comments

Targeting health disparities and disproportionality by race: the transformation effort will be more successful if it incorporates an explicit focus on racial disparities and disproportionality. Strategies should be tailored to be effective with communities of color who are overrepresented and underserved in health care settings as well as the homelessness system. In alignment with the Governor's Interagency Council on Health Disparities' recent recommendations^v, the waiver plan should include the use of equity impact tools in decision making by both the state and ACHs regarding benefit design, program selection, and contractor selection.

Once again, we support Washington's application that addresses the underlying causes of good health. Please contact Anna Markee for further information, anna.markee@buildingchanges.org.

Sincerely,



Alice Shobe
Executive Director

ⁱ Westat, Washington Youth & Families Fund High-Needs Family Program: Outcomes for Families, 2015.
<http://www.buildingchanges.org/library-type/evaluation-results-westat/item/884-high-needs-family-program-outcomes-for-families>

ⁱⁱ S. 896 HEARTH Act of 2009, Homeless Emergency Assistance and Rapid Transition to Housing Act,
<https://www.hudexchange.info/homelessness-assistance/hearth-act/>

ⁱⁱⁱ [24 CFR § 578.7\(a\)\(8\)](#).

^{iv} WA State Department of Commerce [Consolidated Homeless Grant Guidelines](#), Section 12.1 (2015).

^v Governor's Interagency Council on Health Disparities, State Plan to Eliminate Health Disparities, June, 2015.
<http://healthequity.wa.gov/Portals/9/Doc/Publications/Reports/HDC-ActionPlan-June2015-Final.pdf>