pennsylvania
DEPARTMENT OF HUMAN SERVICES

COMMUNITY HEALTHCHOICES (CHC)

OPERATIONS MEMORANDUM #2023-07

SUBJECT: **REVISED-** Home Accessibility Durable Medical Equipment (HADME)

TO: CHC Managed Care Organizations (MCOs)

FROM: Bureau of Policy Development and Communications Management

DATE: ~~October 13, 2023,~~ **May 13, 2024**

PURPOSE

The CHC Agreement, in Exhibit A - Covered Services, requires that ~~home accessibility durable medical equipment~~ HADME be covered as a physical health state plan service. Medical Assistance Bulletin (MAB) 09-21-04, issued September 21, 2021, and titled "Coverage of Home Accessibility Durable Medical Equipment and the Procedure for Obtaining an 1150 Administrative Waiver in the Fee-for-Service Delivery System" details examples of items that meet the criteria to be considered HADME. The 1915(c) Home and Community-Based Services (HCBS) Waiver Home Adaptations service definition in Appendix C: Participant Services, C1/C3: Service Specification, details items that may be covered as Home Adaptations. This Operations Memorandum provides guidance to CHC-MCOs to clarify when an item should be treated as HADME and when it should be treated as a Home Adaptation.

PROCEDURES

HADME are items that are primarily and customarily used to serve a medical purpose, generally not useful to an individual in the absence of a disability, illness or injury, can withstand repeated use, and are reusable or removable. These are items that can be installed and easily removed with minimal structural impact to the residence and damage to the item. Home Adaptations are permanent alterations to the structure of the residence that cannot be easily remediated in order to restore the domain to its previous state.

The ease of removability versus the permanency of the installation must be considered when determining whether an item should be processed as a request for

HADME or a Home Adaptation. The HADME bulletin referenced in the previous section includes a non-exhaustive list of items that generally meet the criteria of HADME such as wheelchair lifts, stair glides, ceiling lifts, and metal accessibility ramps, which are medically necessary to enter and exit the home or to support activities of daily living and meets the definition of 42 CFR § 440.70(b)(3)(i-ii). Ancillary installation costs are also included as part of the project.

Items listed in the 1915(c) HCBS Waiver under Home Adaptations may under certain conditions, depending upon the type of installation and ease of removability, be considered as HADME. Some of these instances (i.e., vertical lifts, track lifts, stair glides/lifts) were specifically ~~pointed out~~ identified in the most recent waiver amendment effective April 1, 2023. Additional items listed in the Home Adaptations section of the waiver that should be considered for HADME based on installation and removability are noted below.

- Ramps from street, sidewalk or house (Ramps that are ~~easily~~ reusable or removable ~~and reusable~~ without damage to the item are not considered Home Adaptations and are covered by the Medical Assistance (MA) State Plan as HADME)
- Vertical lifts (Vertical lifts that are ~~easily~~ reusable or removable ~~and reusable~~ without damage to the item are not considered Home Adaptations and are covered by the MA State Plan as HADME)
- Track lift systems. (~~A t~~Track lift systems involve~~s~~ the installation of a “track” in the ceiling for moving a participant with a disability from one location to another. ~~(Portable lift systems that are easily removable and reusable are not considered Home Adaptations and are covered by the MA State Plan as HADME)~~ Track lift systems that are reusable or removable without damage to the item are not considered Home Adaptations and are covered by the MA State Plan as HADME)
- Handrails and grab-bars in and around the home (Handrails and grab-bars that are ~~easily~~ reusable or removable ~~and reusable~~ without damage to the item are not considered Home Adaptations and are covered by the MA State Plan as HADME)
- Outside railing to safely access the home (Railings that are ~~easily~~ reusable or removable ~~and reusable~~ without damage to the item are not considered a Home Adaptation and are covered by the MA State Plan as HADME)
- Bathroom adaptations for bathing, showering, toileting and personal care needs (Items such as ~~shower chairs and~~ grab-bars that are ~~easily~~ reusable or removable ~~and reusable~~ without damage to the item are not considered Home Adaptations and are covered by the MA State Plan as HADME)

- Stair gliders and stair lifts (Stair gliders and stair lifts that are ~~easily~~ reusable or removable ~~and reusable~~ without damage to the item are not considered Home Adaptations and are covered by the MA State Plan as HADME)
- Other adaptations, subject to CHC-MCO approval, to address specific assessed needs as identified in the service plan. (Other adaptations not included in this list should be reviewed on a case by case basis and evaluated to be HADME or a Home Adaptation based on the installation and ease of removability and reusability)

Participants must access State Plan services for identified accessibility needs, including items noted above, if the items meet the criteria outlined in MA Bulletin 09-21-04 referenced above~~. As such, the CHC-MCO must first obtain requested items through any available third-party resources and then through the MA Program~~. Home Adaptations and installation of HADME are not covered as a State Plan service. ~~under the MA Program; t~~The CHC-MCO should consult the list of actions that are identified as an installation versus a home modification in the referenced MA Bulletin. Home Adaptations may be provided through the CHC HCBS waiver when necessary to support installation of the item. Examples of these are described below.

- Deck modification for a metal ramp: The deck modification is a Home Adaptation, and the metal ramp is HADME
- Doorway widening needed to install a stair glide: The doorway widening is a Home Adaptation, and the stair glide is HADME

Items that are considered HADME and covered under the MA ~~Program~~ State Plan are subject to the required timeframes for notification of decisions as outlined in the CHC Agreement, Section V.B.2, Time Frames for Notice of Decisions. Decisions for Home Adaptations must meet the timeframes set forth in Section V.B.3, Time Frames for Notice of Decision for HCBS Waiver Home or Vehicle Modifications, Pest Eradication, or Assistive Technology Requests, of the Agreement.

NEXT STEPS

1. Review this information with appropriate staff.
2. Contact the Bureau of Coordinated and Integrated Services if you have any questions.