

**Managed Care Operations Memorandum**  
**General Operations**  
**MCOPS Memo # 10/2023-012**

**Date:** October 5th, 2023

**Subject:** Street Medicine

**To:** All Physical Health HealthChoices Managed Care Organizations (PH-MCOs)

**From:** Gwendolyn Zander, Director, Bureau of Managed Care Operations, Office of Medical Assistance Programs

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**Purpose:**

To advise PH-MCOs of a new Place of Service code that must be used on encounters for MA-covered services to members experiencing unsheltered homelessness when delivered in their lived environment.

**Background:**

People experiencing homelessness in the United States die, on average, three decades earlier than their peers with housing, most commonly due to preventable and treatable chronic medical conditions. Meanwhile, the health care utilization costs for people experiencing homelessness are five times the national average, mainly due to an over reliance on the emergency room for routine medical care and increased hospitalization rates for illnesses presenting in advanced stages. Based on this information, street medicine was developed as a model for bringing access to preventive and diagnostic services and treatment to meet the complex needs of people experiencing unsheltered homelessness in their lived environment with the goal of improving outcomes and reducing unnecessary emergency department visits.

Street medicine uses physical and behavioral health services that address the unique needs and circumstances of people experiencing unsheltered homelessness and delivered directly to them in their own lived environment. The fundamental approach of street medicine is to engage people experiencing unsheltered homelessness exactly where they are and on their own terms to reduce or eliminate barriers to care access and follow-through. Visiting people in their lived environment – such as in alleyways, under bridges, within urban encampments – is a necessary strategy to facilitate trust-building with this vulnerable population.

On July 5, 2023, the Department of Human Services (Department) issued MA Bulletin 08-23-12 et.al. titled "Street Medicine," to inform MA providers that the Department will pay for certain physical and behavioral health services including but not limited to primary care, vaccine administration, wound care, preventive services, counseling, and diagnostic services, when delivered to MA beneficiaries experiencing unsheltered homelessness when delivered in their lived environment. The MA Bulletin identified the eligible providers and instructed them to use Place of Service (POS) 15 (Mobile Unit) with the U2 modifier to indicate the service was rendered to a beneficiary experiencing unsheltered homelessness in their lived environment.

The Centers for Medicare & Medicaid Services created POS 27 (Outreach Site/Street), that will be effective October 1, 2023. POS 27 is defined as a non-permanent location on the street or found environment, not described by any other POS code, where health professionals provide preventive, screening, diagnostic, and/or treatment services to unsheltered homeless individuals. On September 29, 2023, the Department issued an updated MA Bulletin, MA Bulletin 01-23-26 et. al., to replace the July 5 MA Bulletin, announce the use of POS 27, and expand the scope of providers that may bill for certain MA-covered services using POS 27 in the MA Fee For Service (FFS) delivery system.

#### **Discussion:**

Section VIII.B – Systems Requirements of the HealthChoices Agreement requires that PH-MCOs must submit electronic data as specified by the Department.

To align with FFS coverage, to facilitate tracking, and to ensure that services are made available to unhoused members, PH-MCOs must provide coverage, at a minimum, for the services included in MA Bulletins pertaining to street medicine when rendered by a provider included in the scope of those bulletins. PH-MCOs may cover additional services or services rendered by additional provider types in a member's lived environment if it is clinically appropriate to do so. Encounters submitted to the Department must use POS Code 27 to indicate when services are rendered to a beneficiary experiencing unsheltered homelessness in their lived environment.

#### **Next Steps:**

PH-MCOs must update their claims and encounter data systems to incorporate POS 27. PH-MCOs must advise their provider networks of the ability to submit claims using this POS code and must submit encounters using POS 27 when services are rendered to a member experiencing unsheltered homelessness in their lived environment on and after October 1, 2023. For any services rendered prior to October 1, 2023, POS 15 with the U2 modifier, as initially announced in MA Bulletin 08-23-12, may still be used.

**Obsolete:**

This MC OPS memo will remain in effect until it is superseded.