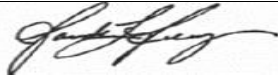


STATE OF NEW HAMPSHIRE BDS GENERAL MEMORANDUM (GM)	
DATE:	6/5/2023
TO:	Service Coordination Agencies, Developmental Services Providers of Medicaid Home and Community Based Waiver Services, Area Agencies, BDS Staff
FROM:	Sandy Feroz, Bureau Chief, Bureau of Developmental Services
SIGNATURE:	
SUBJECT:	Community Integration Services Guidance
GM NUMBER:	GM#23-008
EFFECTIVE DATE:	7/1/23
REGULATORY GUIDANCE:	This memo is a communication tool circulated for informational purposes only. The goal is to provide information and guidance to the individuals to whom it is addressed. The contents of this memo and the information conveyed are subject to change. This communication is not intended to take the place of or alter written law, regulations or rule.

MEMORANDUM SUMMARY
The purpose of this memorandum is to provide guidance on Community Integration Services and when this service can and cannot be accessed to cover activities and supports.

Community Integration Services (CIS), as described in the approved Acquired Brain Disorder (ABD), Developmental Disabilities (DD) and In Home Supports (IHS) Waivers, are intended to support a person with a disability to access community-based activities. The purpose of CIS is to support the utilization of activity-based interventions accessed to address the assessed needs of an individual as a means to health and well-being and as outlined in the service agreement. CIS are designed to support and enhance a person's level of functioning, independence and life activities, to promote health and wellness as well as reduce or eliminate the activity limitations and restrictions to participation in life situations caused by a disability. CIS provides support and does not pay for the fees associated with a diversional/recreational activity.

The Centers for Medicare and Medicaid Services (CMS) technical assistance guide, *Instructions, Technical Guide and Review Criteria*, outlines that services that are diversional/recreational in nature fall outside of the scope of the 1915(c) waivers. This includes all services on the ABD, DD and IHS Waivers, including CIS.

What can be covered: CIS can be used to cover activities that are based on assessed needs using qualified providers, which are related to an individual's disability, and are not generally available to the community at-large. Some examples include:

- Therapeutic horseback riding
- Music therapy
- Art therapy

What cannot be covered: CIS cannot be used to cover activities that are diversional/recreational in nature. These activities are typically available to the public at-large and are not based on any activity participant's assessed needs. Some examples include:

- Admission to diversional/recreational activities such as:
 - Amusement parks
 - Trampoline parks
 - Movie theaters
 - Mini golf
 - Bowling
 - Horseback riding lessons
 - Indoor skydiving
 - Art classes
- Leisure activity fees/tuition such as:
 - Lessons
 - Clubs
 - Concerts
 - Dances
 - Crafts

The following are examples to demonstrate when CIS can and cannot be accessed for activities and supports:

Example #1

Sally has an assessed need for muscle tone development and core strength development based on a diagnosis of cerebral palsy, and Sally and Sally's family feel that therapeutic horseback riding would be appropriate to work on the assessed need of muscle tone development. The therapeutic horseback riding is a specific program designed to utilize activity-based interventions to address the assessed needs of an individual as a means to health and well-being and the program is different than traditional horseback riding lessons. It is offered by a credentialed instructor. CIS is likely appropriate in this example.

Example #2

Sally has an assessed need for muscle tone development and core strength development based on a diagnosis of cerebral palsy, and Sally and Sally's family expresses that Sally would enjoy working on goals related to this need during a preferred activity. Sally chooses horseback riding lessons. The horseback riding lessons are offered to the public at-large, as they are not a specific program designed to utilize activity-based interventions to address the assessed needs of an individual as a means to health and well-being. Horseback riding lessons offer benefits to all who participate, but not necessarily based on an individual's assessed needs. CIS is not appropriate.

Important Note: In this example, even though the waiver cannot pay for the horseback riding lessons, it can be accessed, using the applicable waiver service, to assist Sally with transportation needs (Non-Medical Transportation Services), staff supports needed while they are participating in the horseback riding lesson, specialized equipment needed to participate in the lesson (Individualized Goods and Services), assistive technology, etc. that are based on assessed needs.

If an individual chooses to participate in their approved waiver services at a location that is diversional/recreational, the admission and associated fees are not covered by the waiver. However, as noted above in Example #2, the waiver may be accessed (based on assessed need), using the appropriate waiver services, to cover transportation to the diversional/recreational activity, the staff supports provided during the activity and any assistive technology that may be needed to participate in the activity.

Service Planning

Service planning must be done on an individualized basis, using information related to an individual's assessed needs to determine if there is an appropriate waiver service to meet their assessed needs. All service requests should be reviewed to determine the most appropriate waiver service to be accessed. For example:

Sally has an assessed need for muscle tone development and core strength development based on a diagnosis of cerebral palsy. Sally and Sally's family request that CIS be accessed to cover yoga classes. The yoga classes are offered to the public at-large and are not a specific program designed to utilize activity-based interventions to address the assessed needs of an individual as a means to health and well-being. Yoga classes offer benefits to all who participate, but not necessarily based on an individual's assessed needs. CIS is not appropriate, however, Wellness Coaching should be explored by the planning team if yoga was selected based on a licensed recreational therapist or certified personal trainer's recommendation.

If an individual's services and support request cannot be covered with HCBS Waiver funding, individuals should work with their Service Coordinator to identify alternative resources that are available, personal or community.

Thank you. Please contact your Regional Liaison with any questions.