

Community Supports for Members Experiencing or At Risk of Homelessness: Key Updates

May 14, 2025
All Comer Webinar

Context & Opening Remarks

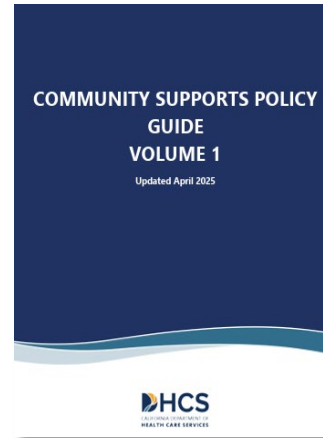
Two wavy, horizontal lines in shades of blue and teal, positioned below the title and above the main content area.

Introducing the Updated Community Supports Policy Guide

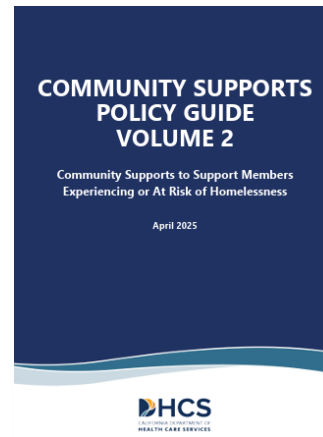
DHCS has released an updated Community Supports Policy Guide—reorganized into two separate volumes available on the [Community Supports webpage](#).

These updates:

- » Include the newest 15th Community Support, Transitional Rent.
- » Are in response to stakeholder feedback from the initial years of program implementation, in alignment with DHCS' [ECM and Community Supports Action Plan](#).



- » ***UPDATED*** [Community Supports Policy Guide Volume 1](#) contains the service definitions for eight of the Community Supports that address Members' health-related social needs.



- » ***NEW*** [Community Supports Policy Guide Volume 2](#) contains Transitional Rent and other Community Supports for Members experiencing or at risk of homelessness.

Homelessness in California

California accounts for more than a quarter of all homeless people in the U.S., with more than 180,000 Californians facing homelessness each night.¹

Who is Experiencing Homelessness in California (2023)¹

- » **38%** of all people experiencing homelessness are chronically homeless
- » **66%** are unsheltered homeless
- » **37%** identify as Latino/x
- » **Higher proportions of people identifying as Black or Native American** are homeless compared to the overall California population

Homelessness is a Health Care Issue²

- » **35%** are individuals experiencing chronic substance use
- » **66%** are individuals experiencing untreated mental health conditions, including serious depression, anxiety, memory problems, and hallucinations
- » **60%** have at least one chronic condition, like hypertension, asthma or COPD
- » Experience more **frequent and longer hospital stays**

1. Data from [U.S. HUD 2024 Point-in-Time Estimates](#).

2. Data from [UCSF - California Statewide Study of People Experiencing Homelessness Report \(June 2023\)](#).

Housing Efforts as Part of DHCS' Medi-Cal Transformation



California is transforming Medi-Cal to improve health care quality, access, and outcomes for Medi-Cal Members.

- » In 2022, California Advancing and Innovating Medi-Cal (CalAIM) introduced:
 - The **Enhanced Care Management (ECM) benefit**, for the highest-risk, highest-need Members; and
 - A menu of **14 Community Supports**, which are services that help improve the health and well-being of Medi-Cal managed care plan (MCP) Members by addressing their health-related social needs, supporting healthier lives, and avoiding higher, costlier levels of care.
- » **Transitional Rent is the newest Community Support and will go live across California in 2026.** Transitional Rent was authorized under the BH-CONNECT* Section 1115 demonstration waiver. With this launch, California joins a number of other states in offering up to 6 months of rental assistance through Medicaid.

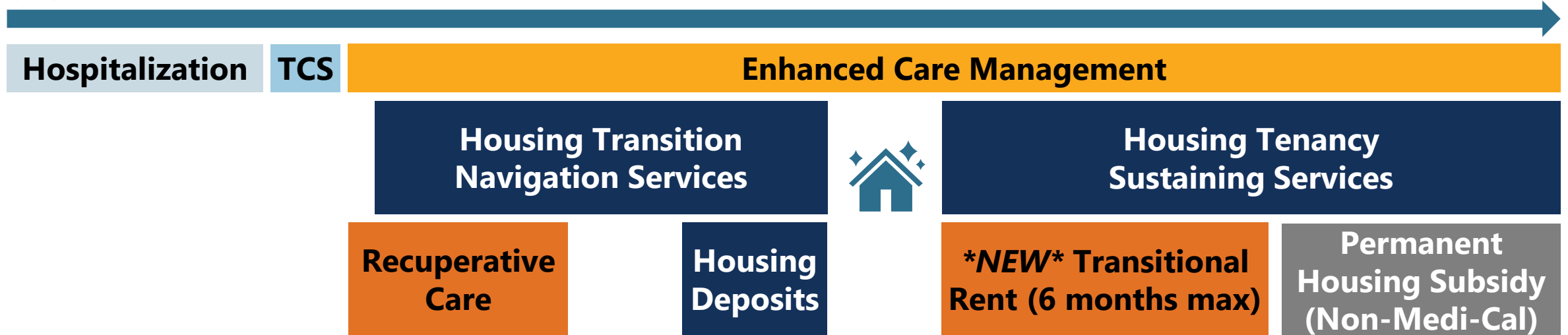
*BH-CONNECT = Behavioral Health Community-Based Organized Networks of Equitable Care and Treatment

How Medi-Cal Can Support the Journey to Stable Housing

Multiple Medi-Cal services can be combined to support Members including temporary room and board.



Member Experiencing Homelessness



■ Community Supports – Housing Trio Services

■ Community Supports – Room and Board Services

Connecting Medi-Cal and BHSA Transformation

DHCS will soon broaden its housing-related services and supports, both within Medi-Cal, through Transitional Rent, and beyond Medi-Cal, with the implementation of BH Transformation.



Transitional Rent ***(Medi-Cal Community Support)***

- » Mandatory MCP coverage of **up to six months** of rent for the Behavioral health Population of Focus
- » Optional coverage for other Transitional Rent Populations of Focus



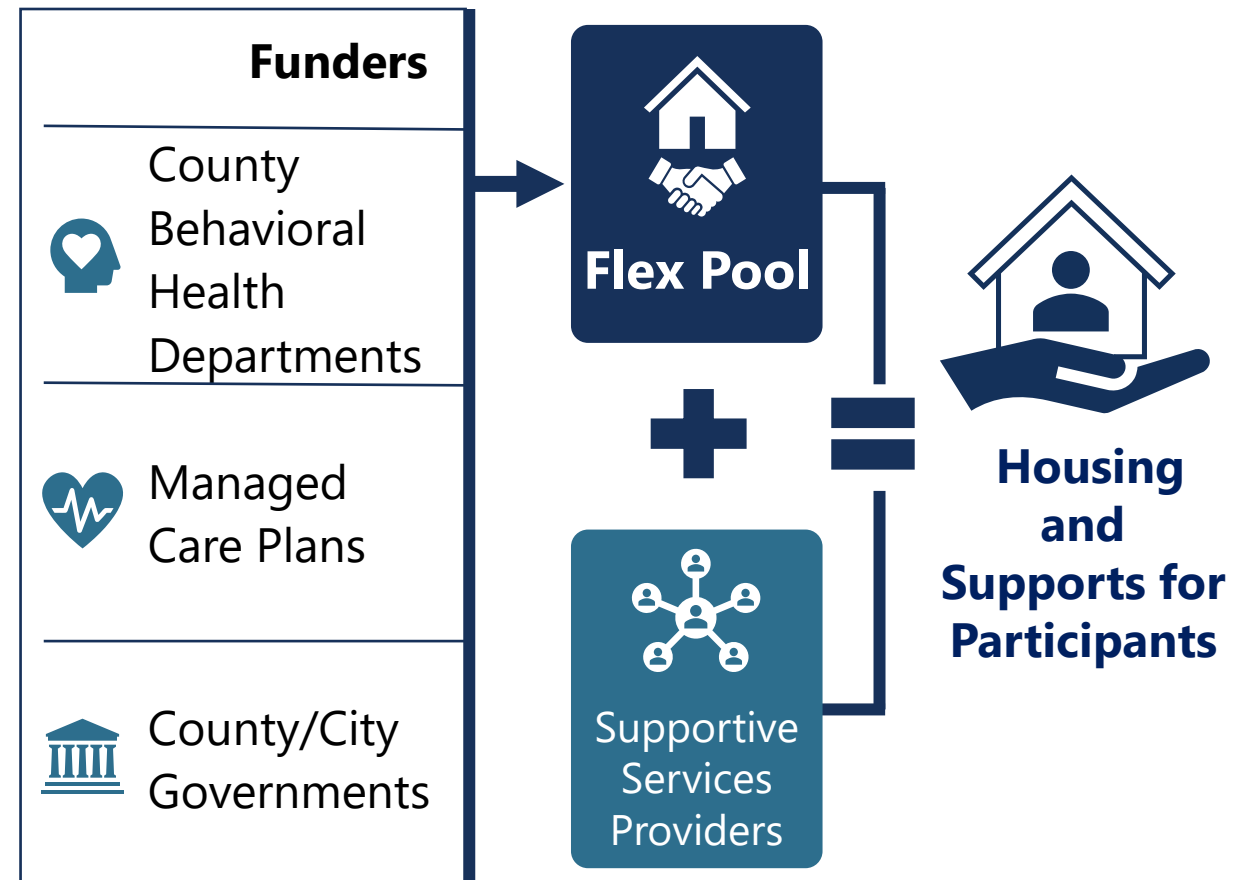
Behavioral Health Service Act (BHSA) **Housing Interventions** ***(Non Medi-Cal Program)***

- » Counties will place and sustain individuals with significant behavioral health needs in permanent and interim housing settings

New! Flexible Housing Subsidy Pools Request for Applications

DHCS encourages the development of Flexible Housing Subsidy Pools (“Flex Pools”) as an effective model to streamline and simplify administering Transitional Rent and coordinating related housing supports.

- » Flex Pools are a locally designed model for streamlining provision of housing supports and engaging landlords.
- » **The Flex Pools RFA**, now open for submissions on the [DHCS Housing for Health website](#), invites applicants for two opportunities in support of Flex Pools:
 - 1. Participation in the Flex Pools Academy**, which offers individualized technical assistance.
 - 2. \$150k Planning Grants** for county behavioral health agencies and/or tribal entities to launch and operationalize a Flex Pool.
- » The RFA is due **Friday, June 13, 2025**.



Today's Agenda

1. **(10 minutes)** Recap the Community Supports for Members experiencing or at risk of homelessness.
2. **(20 minutes)** Summarize the key updates made to existing Community Supports service definitions.
3. **(10 minutes)** Discuss the coordination required between Medi-Cal MCPs and County Behavioral Health Agencies on housing initiatives.
4. **(30 - 40 minutes)** Provide an overview of Transitional Rent, DHCS' latest Community Support service.
5. **(Remaining Time)** Q&A

Questions?



- » Please use the Q&A feature to send your questions and comments.
- » We will also hold a brief Q&A session at the end of our presentation.

A recording of today's webinar will be posted on the DHCS Community Supports webpage in ~3 weeks.

1. Community Supports to Support Members Experiencing or At Risk of Homelessness



DHCS' Menu of Community Supports Services

The updated Community Supports Policy Guide organizes the services into two volumes.

Volume 1

1. Respite Services
2. Assisted Living Facility Transitions*
3. Community or Home Transition Services*
4. Personal Care and Homemaker Services
5. Environmental Accessibility Adaptations (Home Modifications)
6. Medically Tailored Meals/Medically Supportive Food
7. Sobering Centers
8. Asthma Remediation

**Names of these Community Supports have been updated*

★ Volume 2 ★

9. **Housing Transition Navigation Services**
10. **Housing Deposits**
11. **Housing Tenancy and Sustaining Services**
12. **Day Habilitation Programs**
13. **Recuperative Care (Medical Respite)**
14. **Short-Term Post-Hospitalization Housing**
15. ***New* Transitional Rent**

★ **Focus of Today's Webinar**

Community Supports to Support Members Experiencing or At Risk of Homelessness

The services in Volume 2 fall into three categories.

Housing Trio Services

- » Housing Transition Navigation Services (HTNS)
- » Housing Deposits
- » Housing Tenancy and Sustaining Services (HTSS)

Room and Board Services

- » Recuperative Care (Medical Respite)
- » Short-Term Post-Hospitalization Housing (STPHH)
- » ***NEW*** Transitional Rent

Other

- » Day Habilitation Programs

Global Cap on Coverage of Room and Board Services

Per the requirements in CalAIM and BH-CONNECT, DHCS has a “global cap” on coverage of Room and Board Services (i.e., Short-Term Post-Hospitalization Housing, Recuperative Care, and Transitional Rent).

Service	Service Includes	Limits per Service	Global Cap <u>across Room and Board Services</u>
Recuperative Care	Clinical services with Room and Board	6-month limit per rolling 12-month period (per Member)	<ul style="list-style-type: none"> • 6-month (i.e., 182 day) limit per rolling 12-month period also applies across <u>all three</u> Room and Board services. • 12 month rolling timeframe begins on the first day the Member uses any of these services. • The Room and Board cap is counted in days.
Short-Term Post Hospitalization Housing (STPHH)			
Transitional Rent	Room and Board only	6-months of service per 5-year demonstration (per household)	

*See appendix slides for member scenarios to help illustrate these concepts.

Housing Support Plan

With the addition of Transitional Rent, DHCS is further emphasizing the key role the housing support plan plays across services.

When is a housing support plan required?

- » Development and maintenance of a housing support plan has always been part of the expectation for the **Housing Trio**.
- » MCPs must ensure that a Member has a housing support plan in place as a condition for authorizing a Member for **Transitional Rent**.

Who can develop it?

Provided it meets the **requirements elements**, it may be developed by a Community Supports Provider, a flex pool or hub organization that coordinates supportive services, or other Housing Providers, including county behavioral health agencies, regardless of their participation in Medi-Cal or as a contracted Provider.



Required Elements?

- » The permanent housing strategy and solution for the Member.
- » The full range of permanent housing supports that will support the Member in sustaining tenancy.
- » Be informed by Member preferences and needs and revised as a Member's circumstances change.
- » Be based on a housing assessment that addresses identified barriers.
- » Be developed in a way that is culturally appropriate and trauma-informed.

2. Housing-Related Community Supports: What Has Been Updated?



Updates in Volume 2

DHCS has prioritized key updates to its existing Community Supports service definitions.

The updates in Volume 2:

- » Streamline and clarify certain eligibility criteria
- » Clarify, add, and remove certain service sub-components
- » Adjust certain restrictions and limitations based on federal requirements

DHCS

- » Listened to feedback from stakeholders implementing the services since 2022
- » Focused on how the services can best work together, including with Transitional Rent
- » Implemented certain federal requirements that are new since 2022

Key Updates to Housing Transition Navigation Services (HTNS)

HTNS assist Members with finding, applying for, and obtaining housing.

Updated Eligibility Criteria

1. Experiencing or at risk of homelessness and meeting certain clinical risk factors.

OR

2. If determined eligible for Transitional Rent, then automatically eligible for HTNS

OR

3. Prioritized for permanent supportive housing or rental subsidies.

Service Components

- » Minor clarifications (see pp. 25-26).

Restrictions & Limitations

- » No updates.

Note: For the Housing Trio, the eligibility criteria is now fully aligned.

Key Updates to Housing Deposits

Housing Deposits assist with identifying, coordinating, securing, or funding one-time services and modifications necessary to enable a person to establish a basic household.

Updated Eligibility Criteria

1. Experiencing or at risk of homelessness and meeting certain clinical risk factors.

OR

2. If determined eligible for Transitional Rent, then automatically eligible for Housing Deposits.

OR

3. Prioritized for permanent supportive housing or rental subsidies.

Service Components

- » Removed coverage of first and last month's rent – avoiding duplication with Transitional Rent.
- » Clarified the financial limits on security deposits, based on updated California regulation.
- » Added coverage of application fees.
- » Other minor clarifications (see pp. 31-32).

Restrictions & Limitations

- » Available once per CalAIM demonstration period.¹ *(Previously was available once per lifetime.)*
- » No longer requiring a Member to receive HTNS as a condition of receiving Housing Deposits.

¹ Can be approved one additional time with documentation showing changed conditions that justify a second attempt.

Key Updates to Housing Tenancy and Sustaining Services (HTSS)

HTSS help a Member maintain safe and stable tenancy once housing is secured.

Updated Eligibility Criteria

1. Experiencing or at risk of homelessness and meeting certain clinical risk factors.

OR

2. If determined eligible for Transitional Rent, then automatically eligible for HTSS

OR

3. Prioritized for permanent supportive housing or rental subsidies.

Service Components

- » Made minor updates to some of the HTSS service activities to improve clarity. All updates contain footnotes with an explanation (*see p. 37*).

Restrictions & Limitations

- » Service duration can be as long as necessary. There is no limit on how many times an eligible Member may be authorized for HTSS. (*Previously was available once per lifetime.*)
- » A Member cannot receive both HTSS and HTNS at the same time.

Key Updates to Recuperative Care (Medical Respite)

Recuperative Care, also referred to as Medical Respite, is for individuals who need a short-term residential setting in which to recover from an injury or illness.

Updated Eligibility Criteria

1. Requiring recovery in order to heal from an injury or illness.
AND
2. Experiencing or at risk of homelessness.

Service Components

- » Since assistance with Instrumental Activities of Daily Living (IADLs) and/or Activities of Daily Living (ADLs) is only permitted by licensed providers, Personal Care and Homemaker Services can be used in conjunction.
- » Peer Respite settings may implement Recuperative Care.

Restrictions & Limitations

- » Member can receive the service for a duration of six months per rolling 12-month period (*previously, was available one time during the demonstration with a 90-day limit*).

Key Updates to Short-Term Post-Hospitalization Housing (STPHH)

STPHH provides Members who are exiting an institution with the opportunity to continue their medical/psychiatric/substance use disorder recovery immediately after exiting the institution.

Updated Eligibility Criteria

1. Exiting an institution.
AND
2. Experiencing or at risk of homelessness.
AND
3. Receiving ECM; have a serious chronic condition; have a serious mental illness; or are at risk of institutionalization or requiring residential SUD services.
AND
4. Have ongoing physical or behavioral health needs as determined by a qualified health professional that would otherwise require continued institutional care.

Service Components

- » Peer Respite settings may implement STPHH.

Restrictions & Limitations

- » Member can receive service for a durations of six months per rolling 12-month period (*previously, was available one time during the demonstration with a 6-month limit*).

3. Coordination Required between MCPs and County Behavioral Health Agencies on Housing Initiatives

Two thick, wavy, horizontal lines in shades of blue and teal, positioned below the title and above the main content area.

Upcoming Housing-Related Services

DHCS will soon broaden its housing-related services and supports, both within Medi-Cal, through Transitional Rent, and beyond Medi-Cal, with the implementation of BH Transformation.



Transitional Rent (*Medi-Cal Community Support*)

- Delivered via Medi-Cal Managed Care (MCMC) Delivery System
- Optional MCP coverage in 7/1/25
- Mandatory MCP coverage in 1/1/26, starting with Behavioral Health Population of Focus, followed by additional Populations of Focus in future phases
- Includes coverage of **up to six months** of rent for members who are experiencing or at risk of homelessness and meet additional eligibility criteria.



Behavioral Health Service Act (BHSA) Housing Interventions (*Non Medi-Cal Program*)

- Delivered via County Behavioral Health Delivery System
- Effective 7/1/26
- Counties will place and sustain individuals with significant behavioral health needs in permanent and interim housing settings

How Transitional Rent and BHSA Housing Interventions Fit Together

MCPs and county behavioral health agencies must establish stronger partnerships, coordination, and communication to serve Members with significant behavioral health needs.

- » A central reform of the BHSA is the **requirement that county behavioral health agencies spend 30% of their BHSA funds on Housing Interventions** for individuals with significant behavioral health needs who are experiencing or at risk of homelessness.
- » Importantly, BHSA “funds shall not be used for housing interventions covered by a Medi-Cal managed care plan”.¹ This means that **Members will not be permitted to receive rental assistance under the BHSA so long as Transitional Rent is available to the Member.**
- » Ultimately, DHCS expects Members who receive Transitional Rent from their MCP will **seamlessly continue to receive coverage** of rental assistance and other housing interventions (as applicable) **through BHSA, following the conclusion of Transitional Rent.**

1. California Welfare & Institutions (W&I) Code section 5830(c)(2)

4. Introducing Transitional Rent



The Newest Community Supports Service: Transitional Rent

Under Transitional Rent, MCPs will cover up to six months of rental assistance for Members who are experiencing or at risk of homelessness and meet certain additional eligibility criteria (*see next slide*).

The policies governing Transitional Rent are driven by three key objectives:

- 1) Ensure a connection to long-term housing supports**, such as rental subsidies, for Members receiving Transitional Rent to provide a pathway to housing stability and prevent a return to homelessness.
- 2) Use the temporary housing stability afforded by Transitional Rent as an opportunity to help Members connect to needed health care services.**
- 3) Minimize administrative barriers** (without compromising program integrity), so that Members experiencing or at risk of homelessness can readily access Transitional Rent.



What Transitional Rent Covers

Transitional Rent may be used to cover the following expenses:

- 1. Rental assistance in allowable settings for up to six months¹**
- 2. Storage fees, amenity fees, and landlord-paid utilities that are charged as part of the rent payment**

1. Subject to the six-month global cap on Room and Board services.

Transitional Rent Eligibility Criteria

Eligible high-need Members enrolled in a MCP may be eligible for up to six months of Transitional Rent if they meet the following criteria:



MEET CLINICAL RISK FACTORS

- Meet the access criteria for Medi-Cal SMHS¹, *or*
- Meet the access criteria for DMC² or DMC-ODS³ services, *or*
- One or more serious chronic physical health conditions, *or*
- One or more physical, intellectual, or developmental disabilities; *or*
- Individuals who are pregnant up through 12-months postpartum



+ EXPERIENCING OR AT RISK OF HOMELESSNESS

- As defined by US Department of Housing and Urban Development (HUD) with certain modifications



+ PART OF SPECIFIED "TRANSITIONING POPULATIONS" *or* UNSHELTERED HOMELESS *or* FSP ELIGIBLE

- Transitioning out of an institutional or congregate residential setting, *or*
- Transitioning out of a carceral setting, *or*
- Transitioning out of interim housing, *or*
- Transitioning out of recuperative care or short-term post-hospitalization housing, *or*
- Transitioning out of foster care, *or*
- Experiencing unsheltered homelessness, *or*
- Eligible for FSP⁴

1. SMHS: Specialty Mental Health Services

2. DMC: Drug Medi-Cal

3. DMC-ODS: Drug Medi-Cal Organized Delivery System

4. FSP: Full-Service Partnership

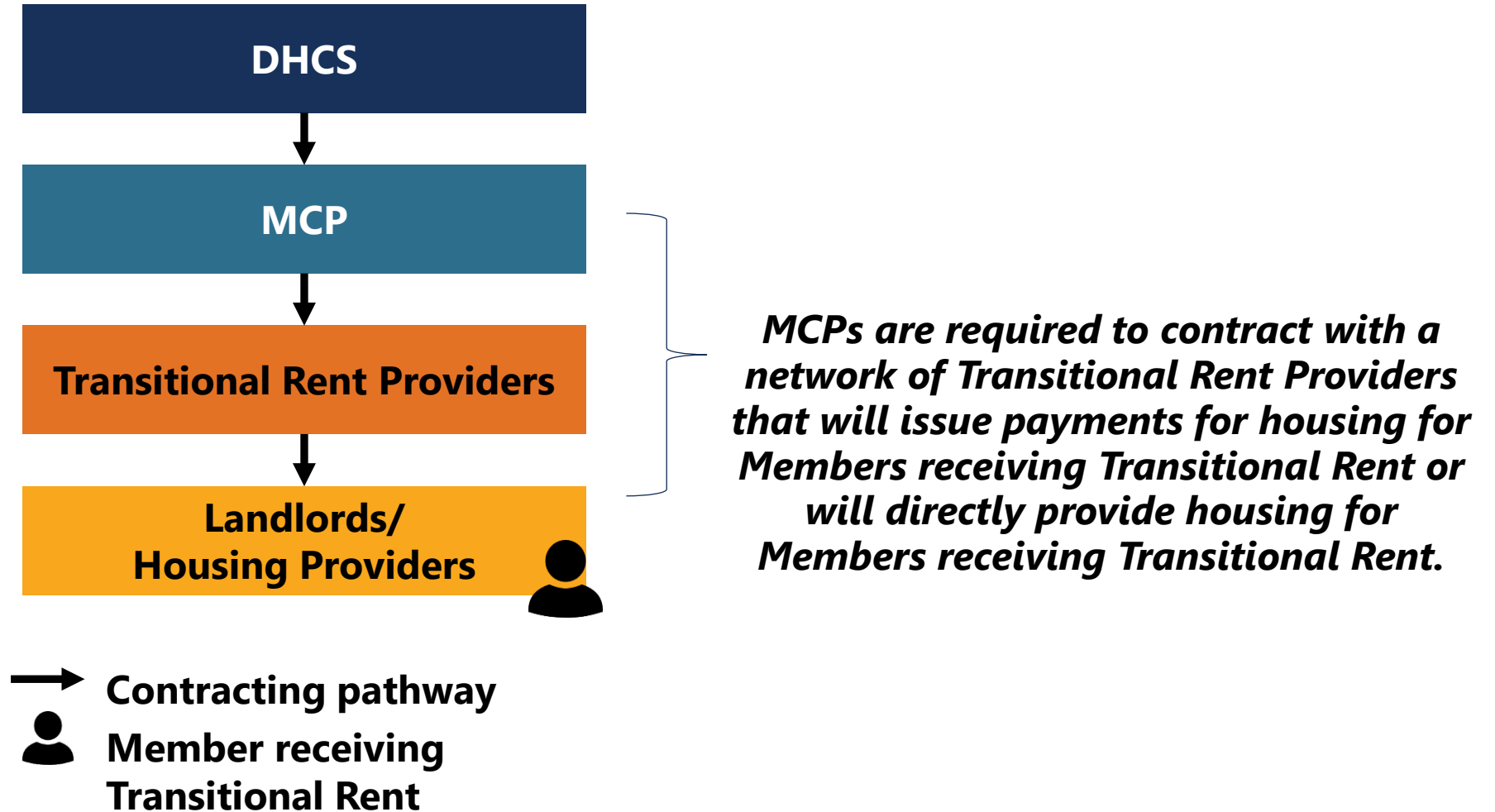
Implementation Timeline

Key Dates	Timeline
July 1, 2025	Optional go-live for MCPs on July 1, 2025 MCPs going live 7/1/25 can choose to go live for: <ul style="list-style-type: none"> The Behavioral Health Population of Focus that must go live January 1, 2026, and/or Additional populations within Transitional Rent-eligible populations*
January 1, 2026	Phase 1: Mandatory launch for all MCPs to cover Transitional Rent for Behavioral Health Population of Focus (POF) <ul style="list-style-type: none"> MCPs may also choose to cover additional populations within the overall Transitional Rent-eligible populations*
July 1, 2026	<i>BHSA go-live</i>
January 1, 2027	Future phase-in of additional POFs – Phase in timeline TBD

Individuals who qualify for the Behavioral Health POF must meet the access criteria for SMHS, DMC, or DMC-ODS, be experiencing or at risk of homelessness and be within a specified transitioning population OR unsheltered OR FSP-eligible.

*If choosing this option, MCPs must continue covering this population through the remainder of the BH-CONNECT demonstration (12/31/2029). For the menu of additional POFs, please see slide 43 of the Appendix.

How Transitional Rent Will Be Delivered



Transitional Rent Providers

Allowable Providers

- » County agencies, including county behavioral health agencies
- » Flex Pools
- » Affordable housing providers
- » Supportive housing providers
- » CoC-affiliated entities
- » Social services agencies
- » Public Housing Authorities
- » Other providers of services for individuals experiencing homelessness

The Transitional Rent Provider will:

- ✓ Identify an appropriate setting/unit.
- ✓ Ensure the housing unit is habitable.
- ✓ Help the Member to review, understand, and execute the lease agreement, and ensuring the lease agreement is compliant and legal.
- ✓ Structure rent payment agreement with landlord or property owner.
- ✓ Issue timely payments to the landlord or other housing provider.
- ✓ Coordinate with the supportive services providers.

Allowable Settings

Transitional Rent includes both interim and permanent settings; MCPs must place Members in permanent and interim settings and may not exclude coverage of any specific setting type.

Permanent Settings

- » Single-family and multi-family homes
- » Apartments
- » Housing in mobile home communities
- » Accessory dwelling units (ADUs)
- » Shared housing
- » Project-based or scattered site supportive housing
- » Single room occupancy (SRO) units*
- » Tiny homes*
- » Recovery housing*
- » License-exempt room and board*

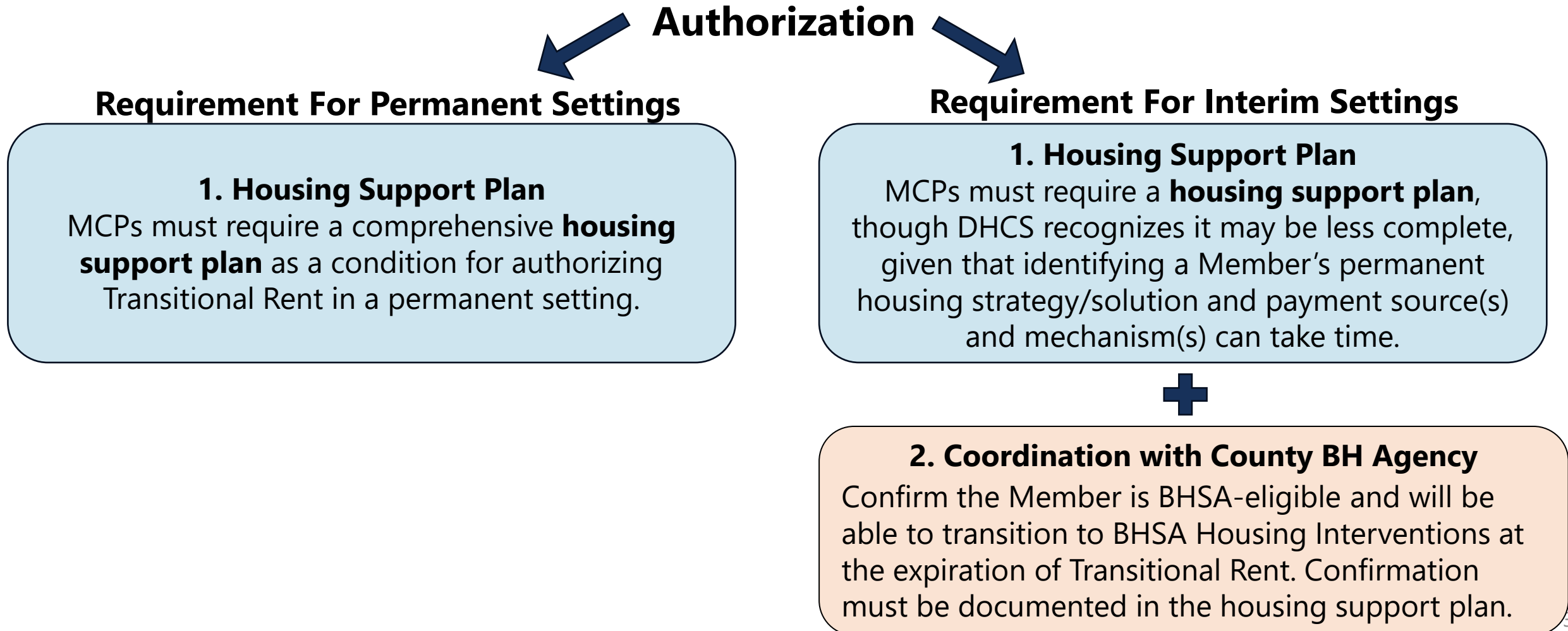
Interim Settings

- » SRO units*
- » Tiny homes*
- » Hotels/motels when serving as the Member's primary residence
- » Interim settings with a small # of individuals per room
- » Transitional and recovery housing* with no lease agreement including:
- » Bridge, site-based, population-specific, and community living programs that may or may not offer supportive services and programming
- » License-exempt room and board*
- » Peer respite

* Indicates that a setting can be permanent or interim. Permanent settings are those with a renewable lease agreement with a term of at least one month.

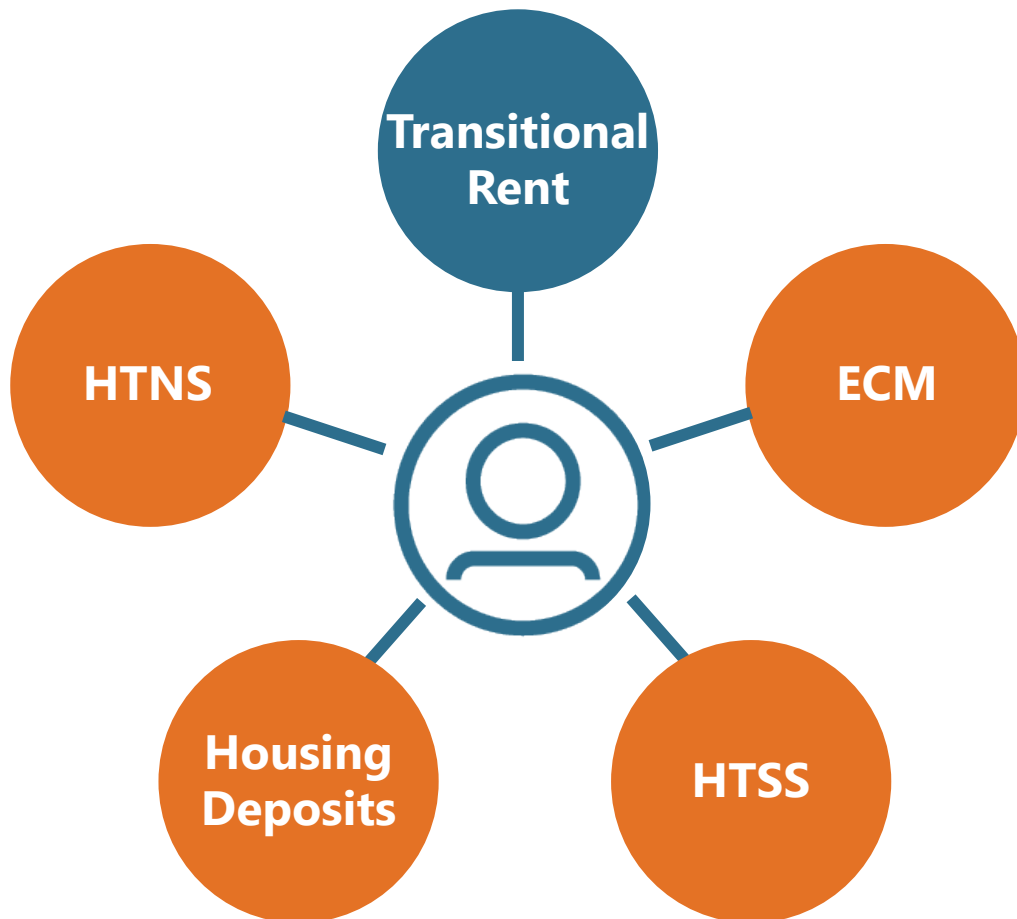
Authorization Requirements

In addition to determining that the Member is eligible for Transitional Rent, the MCP must take the following steps before authorizing Transitional Rent.



Connecting Transitional Rent with ECM & the Housing Trio

DHCS' intention is for Members who are authorized for Transitional Rent to also have access the Housing Trio & Enhanced Care Management (ECM).



Community Supports Housing Trio

- » The Housing Trio can enable a Member to identify, secure, and sustain long-term housing at the expiration of Transitional Rent.

ECM

- » ECM can connect Members to needed health care and social support services, which will help them to take advantage of the housing stability afforded by Transitional Rent.

See next slide for additional policy regarding ECM for the Transitional Rent-eligible population.

ECM for Members Eligible for Transitional Rent

DHCS has established new ECM Requirements for Members who are authorized for Transitional Rent but not yet receiving ECM.

- » The MCP must authorize a Member for ECM and assign an appropriately selected ECM Provider
- » The MCP is required to ensure that the ECM Provider conducts **weekly in-person outreach visits** to the Member as soon as feasible and acceptable to the Member, and **no later than two weeks after a Member begins receiving Transitional Rent**, to invite engagement in ECM until a Member chooses to participate in ECM or declines participation.
- » After the Member chooses to participate in ECM, the Member and ECM Provider should work together to establish a regular schedule and approach to continued engagement based on the Member's needs and preferences.
 - *This reflects an abbreviation of the policy requirements; for comprehensive details, please see pg. 69-70 of the Policy Guide Volume 2.*

MCP and County Behavioral Health Coordination Policies for Transitional Rent

County behavioral health agencies serve as a key access point for Transitional Rent for Members in the Behavioral Health Population of Focus, many of whom will later transition to BHSA Housing Interventions.

Expectation of Contracting

- » In each county where it operates, the MCP must offer a contract to the county behavioral health agency or its designated county department to serve as a Transitional Rent Provider.
- » If the county isn't a "hub" or administrator on behalf of its network, the MCPs must make a good faith effort to contract with county behavioral health agency's network of housing providers.

Streamlined Provisional Authorizations

- » **County behavioral health agency can directly authorize Transitional Rent for a Member for a period of 30 days, if and only if the county behavioral health agency:**
 1. Has a contract with the MCP to serve as a Transitional Rent Provider.
 2. Determines that the Member is BHSA-eligible and commits to providing BHSA Housing Interventions at the expiration of Transitional Rent, or upon denial of the request for coverage by the MCP.

Q&A

Thank you!



- » DHCS thanks all stakeholders for their valuable input and partnership in contributing to the refinement & design of these services to better support Medi-Cal Members.
- » **Join us for a webinar on Volume 1 of the Community Supports Policy Guide: Friday, May 16, 2025 | 11:00 AM – 12:30 PM PT**

Appendix



Updates to Day Habilitation Programs

Day Habilitation Programs are designed to assist a Member in acquiring, retaining, and improving self-help, socialization, and adaptive skills necessary to reside successfully in their natural environment.

Eligibility Criteria

1. Experiencing homelessness.

OR

2. Exited homelessness and entered housing in the last 24 months.

OR

3. At risk of homelessness or institutionalization whose housing stability could be improved through participation in a Day Habilitation Program.

Note: This eligibility criteria was not updated.

Service Components

- Made minor updates to Day Habilitation description. Updates contain footnotes with an explanation. *(See p. 43-44 of the policy guide.)*

Restrictions & Limitations

- No updates.

Transitional Rent Populations of Focus (POFs)

Under both start dates, MCPs have the option to go live with additional POFs under Transitional Rent, beyond the required BH POF for the January 1, 2026 launch.

POF 1 Behavioral Health POF (*mandatory starting 1/1/2026*)

POF 2 Pregnant and postpartum POF

POF 3 Transitioning out of an institutional or congregate residential setting

POF 4 Transitioning out of a carceral setting

POF 5 Transitioning out of an interim housing

POF 6 Transitioning out of recuperative care or short-term post-hospitalization housing

POF 7 Transitioning out of foster care

POF 8 Experiencing unsheltered homelessness

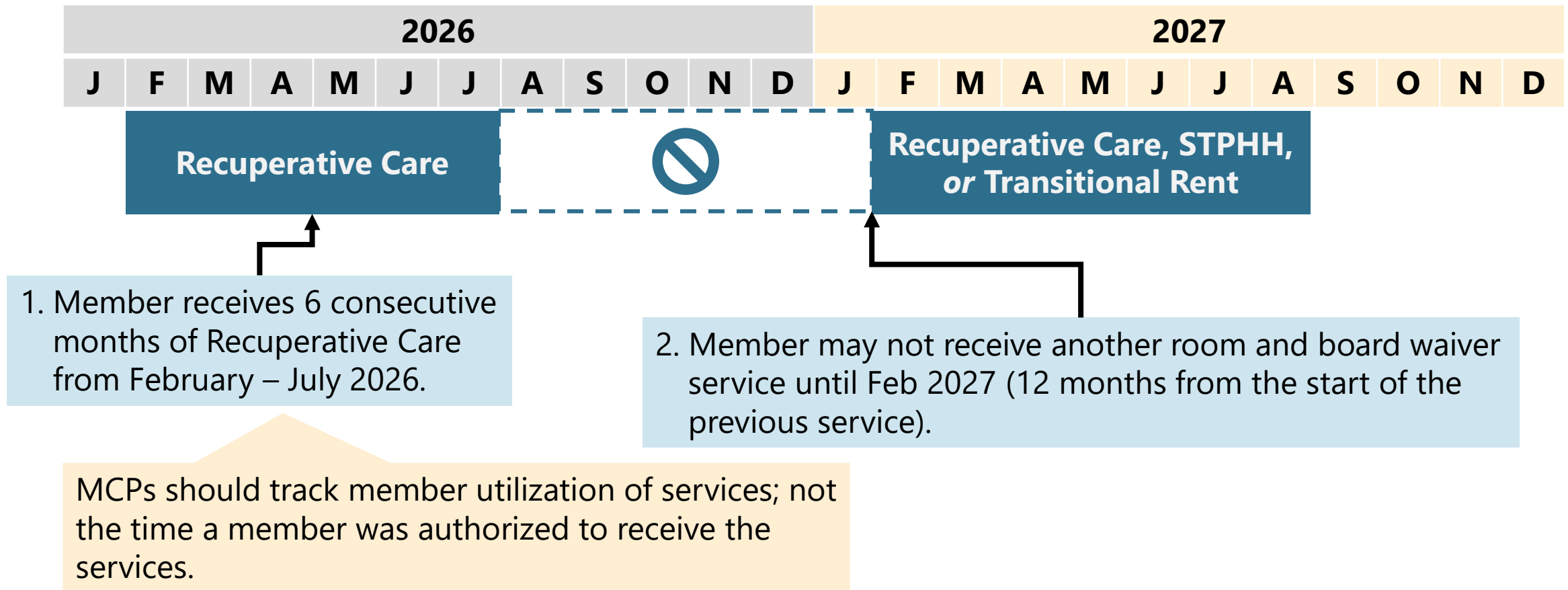
Individuals who qualify for the BH POF (POF 1) must meet the access criteria for SMHS, DMC, or DMC-ODS, be experiencing or at risk of homelessness and be within a specified transitioning population OR unsheltered OR FSP-eligible.

Individuals who qualify for Pregnant and Postpartum POF (POF 2) must also be experiencing or at risk of homelessness and be within a specified transitioning population OR unsheltered OR FSP-eligible.

Individuals who qualify for POFs 3 – 8 must also be experiencing or at risk of homelessness and meet one of the clinical risk factors.

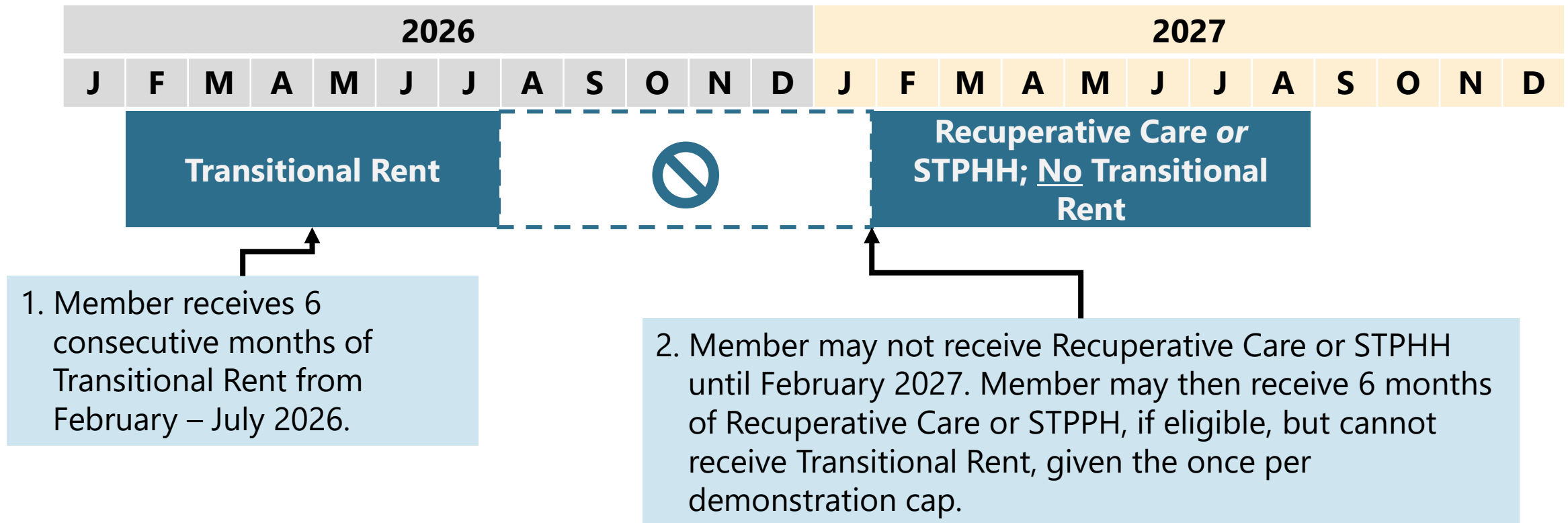
Scenario 1

Person X is a person experiencing homelessness and has been hospitalized. Upon discharge, Person X uses 6 months of Recuperative Care – from February to July 2026. Under the global HRSN housing cap, Person X may not receive another room and board waiver service until February 2027.



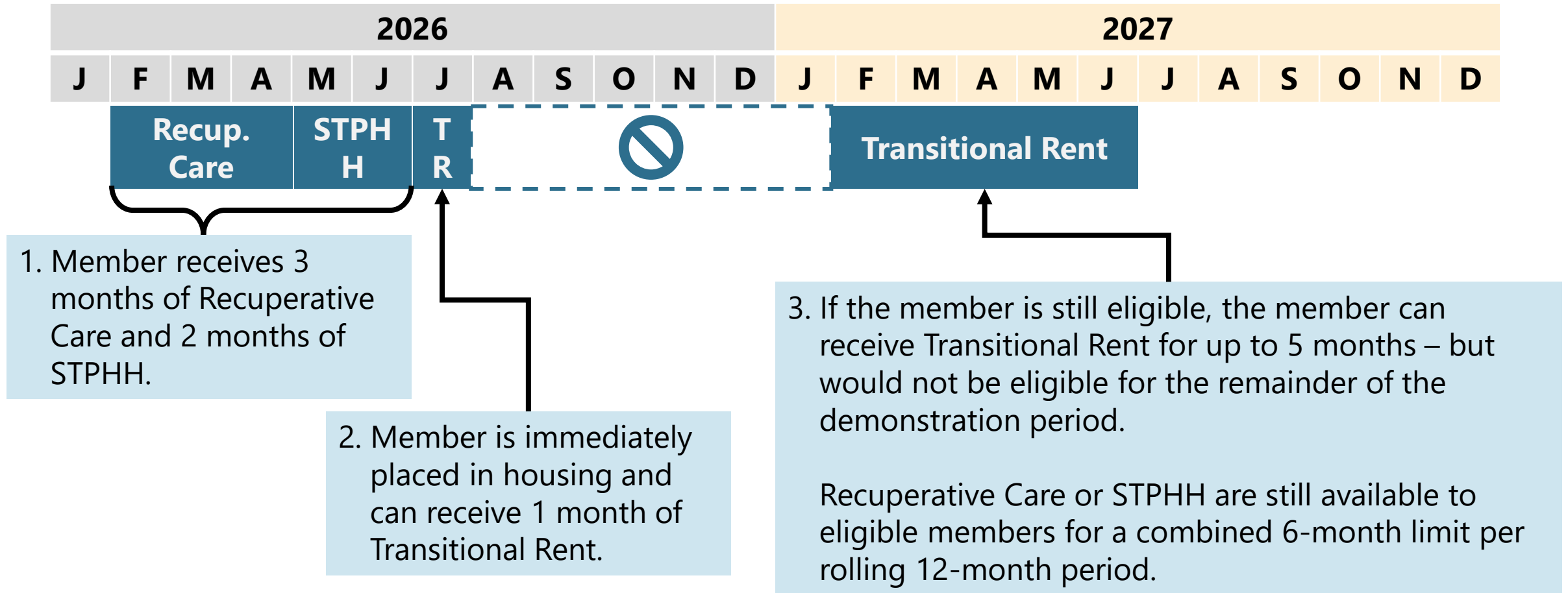
Scenario 2

The same restrictions apply if Transitional Rent is received first. If Member Y receives 6 months of Transitional Rent from February – July 2026, they may not receive Recuperative Care or STPHH until February 2027. Member Y would not be eligible for Transitional Rent after using the 6 months allowed per demonstration period.



Scenario 3

The same rules apply if multiple services occur in a 6-month period.



Scenario 4

The same rules apply if multiple services occur non-consecutively during the rolling 12-month period since the Member began receiving the first service.

