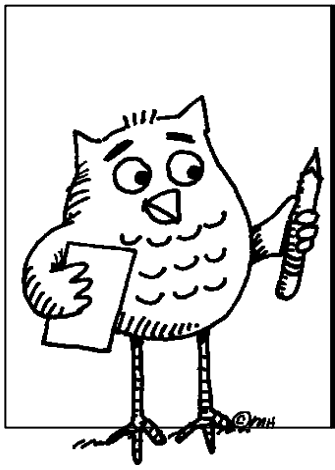

Waiver Wise

Technical Assistance for the Community Options Program Waiver COP-W

Wisconsin Department of Health & Family Services • Division of Supportive Living
Bureau of Aging & Long Term Care Resources

Volume 01 Issue 09

Home Modifications Part II

Background

The following document is the second installment in a two-part series of technical assistance focusing on home modifications. The first document in the series (Volume 01 Issue 02) highlighted general information about home modifications and outlined parameters for modifying bathrooms and building ramps. This piece addresses kitchen modifications, options for improving accessibility and safety in participants' homes, and general questions and answers about home modifications.

Kitchen Modifications

There are two important factors to consider when deciding to modify a kitchen for accessibility and safety. First, determine how much the participant is going to be involved in meal preparation and cleanup. Plans to modify a kitchen should be based on what the participant will be doing in the kitchen on a regular basis. For a participant who helps prepare meals by chopping vegetables only, lowering a small section of counter top would be useful, but an entire kitchen modification would not be appropriate. On the other hand, if a participant prepares his/her meals throughout the day and cleans the kitchen regularly, a more extensive modification could be considered. Care managers may want to contact their local Independent Living Center to discuss ideas for kitchen modifications and to ensure that the most appropriate modification is completed.

Another important factor to consider is participant safety. Once it has been determined what the participant will be doing in the kitchen, it is important to ensure that modifications support the participant to complete these activities safely and minimize the risk of spills, burns, and fires.

Finally, care managers are encouraged to contact their local contractors to determine what permits or licenses are required to complete home modifications. In addition to meeting the standards outlined in the Medicaid Waivers Manual, home modifications must adhere to local building codes.

Note: It is important to remember that kitchen modifications are only waiver allowable if the waiver participant is able to utilize all aspects of the modification. For example, the waiver would not pay for the installation of new upper level cabinets for someone who is unable to reach them.

Common Kitchen Modifications

There are a variety of kitchen modifications available to participants. The following list identifies those most commonly used:

- Lowered counter tops
- Roll-under sinks
- Pull-out cabinet shelves
- Lowered stove tops with burner controls mounted on the front
- Lever action faucet handles
- Lazy Susan cabinets or trays
- Removal of "islands" to open floor plans

When considering kitchen modifications for participants, it is important to look at the *participant's range of reach* and the *usability of controls*. These factors should be considered on an individual basis so participants can maximize their use of the modification and minimize risk.

Other tips to designing appropriate home modifications include the following:

- Counter tops should be lowered to a height that is comfortable and promotes easy use for participants, whether they utilize a wheelchair or stand to complete tasks. Please note that counter tops are currently located at a height of 36", while the standard height for an adult wheelchair with arms is 29" high. Counters can be lowered ***or*** pullout boards can be installed to provide lower workspaces.

- People who use wheelchairs or who prefer to sit while working at the sink will need clearance for their legs. A roll-under sink with a basin bowl 5 ½" deep instead of the standard 7 ½" can be purchased.

- For individuals who have impaired sensitivity in their legs, protection from the hot water supply line and the waste pipes is essential. This can be accomplished by wrapping pipes with insulation or shielding them with a wood screen.

- Avoid stovetops or ranges with burner controls at the back. Reaching over hot pots or burners to make adjustments can be dangerous. Find appliances with controls located in the front that are easy to operate. Buttons or dials work well, especially for individuals with impaired hand movement or coordination.

- Kitchen storage should be determined by a participant's range of reach and ability to lift and carry objects of various weights. The use of Lazy Susan trays and pullout shelves provide adequate storage and assist with reach limitations. With the carousel-style Lazy Susan, all objects stored on the unit can be rotated to the front. Tracked shelves pull out like drawers to bring objects at the rear within reach.

Expensive kitchen modifications are not the only way to make a kitchen safer and more accessible. There are many inexpensive alternatives. The following list identifies some waiver allowable options for making a kitchen more accessible:

- Shallow shelves, racks, or trays mounted to the inside of cabinet doors
- Reachers to remove cans or boxes from cabinet and refrigerator shelves
- A small mirror mounted over the range to see into the pans on back burners
- Wood strips nailed down across shelves to keep objects from wandering to the back and becoming hard to reach
- Unbreakable glass pots let seated cooks see how the food is cooking

Other options for making a kitchen safer for participants include:

- Time barriers that are installed on microwaves with a dial to prevent overcooking or burning
- Timers that can be attached to most electric appliances to automatically turn off the appliance. This reduces the risk of burning or overheating.
- Disconnecting the stove, especially for people with late stage dementia

Kitchen Modification Questions and Answers

Question 1 – Can the waiver pay for the purchase of a dishwasher?

Yes, the waiver will fund the purchase of a dishwasher under SPC 112.99 – Adaptive Aids if the ***participant*** is able to do all the tasks associated with using the dishwasher, including rinsing, loading, and unloading the dishes.

Question 2 – Can the waiver pay for the purchase of a stove with front control knobs?

Yes, the waiver will fund the purchase of a stove with front control knobs under SPC 112.99 – Adaptive Aids if the ***participant*** will be using the stove to prepare meals and can do this in a safe manner. If the participant does not use the stove, the waiver will not fund the purchase. **Note:** Waiver funds can only be used if a current, functional stove is being replaced and an adaptive stove (front control knob) is needed. If the participant's current stove is in disrepair and he/she needs a new one, it is not allowable to use waiver dollars to buy a new stove.

Question 3 – Can the waiver pay for the purchase of a new refrigerator?

Yes, the waiver will fund the purchase of a new refrigerator under the SPC 112.55 – Specialized Medical Supplies:

- If the participant's current refrigerator does not meet the participant's needs, **OR**
- If the refrigerator does not work **and** it is needed to keep food for a special diet or medication refrigerated.

However, the waiver will not fund the purchase of a refrigerator if the participant has never owned or needed one.

Question 4 – Can the waiver pay for lowering kitchen cabinets to make them more accessible?

Yes, the waiver will pay for lowering a participant's cabinets under SPC 112.56 – Home Modifications if the ***participant*** uses them on a regular basis.

Question 5 – Can the waiver pay for adaptive eating or cooking utensils?

These items should be covered under Medicaid. If Medicaid does not cover the items, waiver funds can be used to purchase them under SPC 112.99 – Adaptive Aids.

Question 6 – Can the waiver pay for the removal of a kitchen island to promote accessibility for a participant's wheelchair?

Yes, the waiver will pay for the removal of a kitchen island, as well as any replacement flooring needed after the modification to the floor plan is complete. This can be funded under SPC – 122.56 – Home Modifications.

Other Modifications

Other types of home modifications that support participant independence and safety include widening doorframes and installing stair glides, lever door handles, and lowering or changing light switches.

Keep in mind the following when considering these types of modifications:

- Widened doorframes should have a width of 36". Simple-hinged doors are the easiest to operate, followed closely by sliding "pocket" doors. Select hinges, latches and locks according to ease of operation. "Lever action" door handles are easier to operate by persons whose grip strength and/or hand dexterity is impaired. "Swing clear hinges" can increase the clear openings of a doorway if structural modifications are limited or impossible.

- Stair or chair glides are mounted to one side of a stair's incline, either on the wall or on top of the stairs. This type of equipment does not usually provide a place to carry a mobility aid such as a walker or wheelchair, so a participant may still need assistance in carrying it, or an additional mobility aid may have to be placed at both end locations.

The home modifications noted above support participants to live independently in their homes. And while some necessary modifications are expensive, many other less expensive alternatives are available to support participants equally as well.

- Replace conventional wall light switches with rocker-switch plates.
- Install wall switch extenders rather than lowering light switches.
- Use accessible doorknob covers rather than purchase new lever doorknobs.
- Insert an extended door hinge instead of widening the doorframe.
- Install attachable shelves under the current upper cabinets rather than lowering cabinets.

Common Home Modification Questions and Answers

Question 1 – Can a county choose to fund waiver allowable home modifications with COP funds in order to keep their waiver per diem under the daily rate?

No. Using COP funds violates the Medicaid Waiver directive to utilize waiver dollars first. If you are concerned about per diem rates, contact BALTCR, or for further information, please see pages 138 and 139 of the Medicaid Waivers Manual.

Question 2 – Can a county set a lifetime spending limit on home modifications?

Yes, a county can set a lifetime limitation on home modifications. The policy must be written and approved by the county LTS/COP Planning Committee. However, if a county chooses to establish a limit and a participant has exceeded the limit but the need is still identified, the county is required to meet the participant's needs in some other way. **Note:** It is not allowable to ask that the participant pay the difference between the cost of the modification and the county's limit. The county must access funds from another source.

Counties may also wish to have a clause in their policy that states the county may exceed the limit on an individual basis if it is approved by the Long Term Support Planning Committee.

Question 3 – Can CIP II or COP-W dollars be used to fund the cost of home modification materials when the cost of labor is donated?

Yes. CIP II or COP-W dollars can be used to cover the cost of materials used for an approved Home Modification when the labor for the work is donated.
Examples of groups and individuals that have donated their time to construct Home Modifications for participants include: church groups, teen restitution program, family member, landlord, or even a spouse of a program participant.

The cost of supplies is either reimbursed to the individual or group, or payment is made for the supplies directly to the provider (i.e., local lumber company). Please note that the spouse of a waiver program participant or the program participant **cannot** be reimbursed for any costs of the supplies he/she might purchase, nor can he/she be a paid provider for a Home Modification. In these situations, reimbursement for any supplies can only be made directly to the provider of the supplies. Additionally, the county agency is responsible for verifying the modification was made in accordance with any applicable state and local building codes, keeping in mind that townships and local municipalities can have different codes within the same county.

Question 4 – Can CIP II or COP-W dollars be used to fund a home modification in a house or apartment not owned by the participant? Note: This does not apply to substitute care facilities.

Yes. CIP II or COP-W dollars can be used to fund home modifications in a house or apartment not owned by the participant, as long as the participant resides in the dwelling. The care manager should review the reasonableness of home modification requests and consider the stability and longevity of the participant's residence in rental property or a private home before moving ahead with funding an elaborate home

modification. Please note that according to the Americans with Disabilities Act, landlords must agree with reasonable requests to modify their rental property to provide an individual with safe access to and in the rental property.

In the event a home modification is no longer a necessity, waiver program funds cannot be used to remove the home modification, nor can the waiver program fund any of the costs associated with restoring a property to its pre-modified state after a home modification is removed from a property. Care managers should obtain the landlord's permission and understanding about the no-removal clause.

Question 5 – Can the waiver program fund a home modification to a county or state-certified Adult Family Home (AFH) or Community-Based Residential Facility (CBRF)?

The waiver program cannot fund home modifications in substitute care facilities under a specific waiver participant's name. Rather, substitute care facilities should incorporate the cost of any needed home modification into the care and supervision costs and calculate a new rate.

As a result, prior approval for these home modifications is not required; however, care managers should work closely with the substitute care facilities to assure that the home modification meets the required codes and is performed by a qualified individual.

Question 6 – A participant is changing residence and wants to have his/her home modifications installed in his/her new residence. Examples of home modifications that could be relocated include a ramp (or sections re-used), ceiling track system, stairway lift system, porch lift, and automatic door opener. Can the waiver program fund the cost of taking the home modification from the current residence and installing it at the new residence?

Yes. The waiver program can cover the costs associated with transferring a home modification to another location. This service is billable under SPC 112.56 –home modification. As with all home modifications, applicable materials need to be submitted to The Management Group for review. These materials include an updated Individual Service Plan and an itemized list of the proposed work that includes a breakdown of material and labor costs.

Question 7 – Can the waiver program fund any of the following items as fire/safety adaptions under SPC Code 112.56 – Home Modifications?

- ***smoke alarms***
- ***carbon monoxide detectors***
- ***motion activated lights***

Yes, the waiver program will fund these items because they are mechanisms that alert participants to emergencies or promote a safe exit. However, it is the responsibility of the care manager to explain why these items are necessary and to include this information in the participant's case file.

Question 8 – Can the waiver program fund fire extinguishers, sprinklers systems, and radon detectors as fire/safety adaptions under SPC Code 112.56- Home Modifications?

No, waiver dollars cannot be used to **fund fire extinguishers, sprinkler systems, or radon detectors** because they do not alert participants to emergencies. Fire extinguishers and sprinkler systems extinguish fires but do not alert participants to exit their home. Radon detectors are not allowable because excessive radon in a home does not warrant an immediate need to vacate a home.

Question 9 – Is the purchase and installation of an electric garage door opener an allowable service under SPC Code 112.56 – Home Modification?

Yes, waiver funds can be used to purchase and install an electric garage door opener if:

- The participant is the driver of the automobile and getting out to open the garage door is physically difficult **OR**
- The garage entrance is the ***main*** entrance (i.e. an attached garage) used by the participant to access the home and he/she has difficulty opening a garage door without assistance.

Note: If the vehicle is driven by the program participant's family member and/or caregiver, the purchase and installation of a garage door opener is considered a convenience item and is **not** an allowable service.

Question 10 – Is a stair glide waiver allowable? Is it billable to the waiver program as an adaptive aid or a home modification? What about a ceiling track transfer system?

A stair glide is waiver allowable as a home modification even though it is not a permanent modification and can be disassembled, taken out of a house, and used again in another house.

A ceiling track transfer system is also waiver allowable and should be billed to the waiver program under SPC 112.56 – Home Modifications.

Question 11 – Can the waiver program fund the purchase and installation of a water purifier or water purification system? Example: A participant recently underwent a lung transplant. His physician instructs him to drink the "purist" water he can to decrease his risk for infection. Is a water purifier waiver allowable?

Yes, the waiver program can fund a water purifier or water purification system as a home modification as long as:

- The participant's water quality does not meet acceptable standards, and
- The participant has a long term, irreversible illness or physical condition, which necessitates the consumption of the "purist" water, and
- The participant's physician has documented the medical necessity of the participant having a water purifier or water purification system.

Before considering an expensive water purifying system utilized throughout the home, care managers may want to consider less expensive methods that promote pure water consumption, such as a portable system that attaches to participants' faucets.

Note: Waiver funds can be used to purchase bottled water under SPC 112.55 – Specialized Medical Supplies, or it can be used as a medical/remedial expense.

Question 12 – Can the waiver program fund the purchase and installation of an air exchange unit or air filter into a participant's home?

Yes, the purchase and installation of an air exchange unit or air filter is waiver allowable. Both items need to be documented as medically necessary by a medical doctor. If the air exchange unit and air filter are installed directly into the main furnace of the participant's home, they should be billed under SPC 112.56 – Home Modification. **Portable** air exchange units or air filters also need to be determined medical necessary by a medical doctor and should be billed under SPC 112.55 – Specialized Medical Supplies.

Question 13 – Are window air conditioners considered a home modification or specialized medical supply?

Window air conditioners are considered Specialized Medical Supplies – SPC 112.55. Counties do not need formal approval for this item. It is important to note that care managers should still have documentation within their files that the air conditioner is meeting a medical need as stated by the participant's physician and this item is not able to be funded by Medical Assistance. In addition, paying an individual to install or remove the air conditioner each spring and fall, if necessary, can fall under SPC 112.55 – Specialized Medical Supplies.

Accompanying supplies, such as covers, necessary brackets/supports, and repairs can also be billed under SPC 112.55 – Specialized Medical Supplies.

Question 14 – Can CIP II or COP-W dollars be used to purchase and install central air conditioning into a participant's home?

Yes. Under *limited* circumstances the CIP II or COP-W programs can fund the cost of purchasing and installing central air conditioning into a participant's home under SPC 112.56 – Home Modification. The funding of central air conditioning is approved on an exceptional basis, only when the following criteria are met. First, the need for air conditioning a participant's living space needs to be medically necessary. It is recommended that a written prescription or other type of written documentation be obtained from the participant's physician to document the medical necessity of the air conditioning. This documentation does not need to be sent to TMG but should be retained in the participant's case file.

Second, the cost of installing central air conditioning into a home must be a cost-effective means of meeting the participant's health needs. The cost of providing the participant with window air conditioners needs to be explored. The cost of providing a participant with central air conditioning needs to be less expensive than the cost of purchasing and installing window air conditioners to cool the participant's living space. Typically, a participant's daily living space is considered his/her bedroom and common

living area (i.e., family room or living room). Please note: A participant's daily living space is not every room in the home.

Question 15 – Is a grab bar considered an adaptive aid or a home modification?

If the county uses waiver dollars to purchase just the grab bar itself, it should be considered an adaptive aid (112.99) and no prior approval is needed.

If the county uses waiver dollars to purchase a grab bar and pay someone to install it, the entire bill (both the item and the installation) should be considered a home modification (SPC 112.56), and the county needs prior approval. By lumping both the purchase and installation of a grab bar under one SPC, the county does not have to split up the dollar amount between two different SPCs when it is time to enter this information on HSRS.

If a county will be using Medicaid dollars to pay for the grab bars but needs to use waiver dollars to install them, the cost to install the grab bars would also be considered a home modification (SPC 112.56) and prior approval is needed.