

Housing Stabilization Services Documentation Requirements

The Minnesota Legislature made changes to state laws during the 2025 Minnesota Legislative Session affecting Housing Stabilization Services (HSS) and intended to improve oversight, strengthen anti-fraud efforts, and increase program integrity. Minnesota Statutes, section 256B.051, subdivision 8 was amended to add more documentation requirements effective Aug. 1, 2025. Documentation requirements are located under Billing in the Housing Stabilization Services section of the Minnesota Health Care Programs (MHCP) Provider Manual. This document offers guidance to providers about the new documentation requirements based on questions we've received. Providers need to update their policies and procedures to meet these requirements.

Frequently Asked Questions (FAQs)

Q. Is the signature and statement required for every contact and case note? Does the person need to sign each individual note?

A. Signatures of the employee, person or authorized representative (guardian) and statement(s) must be included with each documentation of a billable service. Documentation requirements are located under Billing in the Housing Stabilization Services section of the MHCP Provider Manual.

Q. Are agencies required to collect a person's signature after each individual visit?

A. Signatures of the person or authorized representative (guardian) and the employee of the agency that provided the service must be included with each documentation of a billable service.

Q. Could you please confirm if combining all three elements (Full name of the service recipient, signature of the service recipient with a statement verifying the accuracy of the service documentation, and statement that it is a federal crime to provide false information on Housing Stabilization Services billings for Medical Assistance payments) into one signed form is acceptable, or if they must be documented separately?

A. All three requirements can be on the same form, as long as all documentation requirements are included for each billable service.

Q. Are signatures required for each direct and remote service billed?

A. Yes. Each billable service must include signatures of the person or authorized representative (guardian) and the employee of the agency that provided the service.

Q. Is a signature required only for direct in-person visits?

A. No. An agency must document delivery of all services regardless of whether it is in-person, indirect or remote and include signatures of the person or authorized representative (guardian) and the employee of the agency that provided the service.

Q. How do we have the person sign documentation for indirect or remote services?

A. Providers will need to work with the person to obtain signatures. Providers will need to update their policies and procedures to meet these requirements.

Q. Are electronic signatures acceptable?

A. No. Electronic signatures are not allowed. DHS requires ink signatures for Housing Stabilization Services.

Q. Do the new documentation requirements apply to housing consultation services?

A. Yes. The new documentation requirements apply to housing consultation services. The only exception for housing consultation is that the start and stop time/length of time spent with the person is not required.

Q. Is it sufficient to obtain a single signature at the start of services or on a monthly basis? Would a biweekly or monthly signature suffice for the entire billing period be acceptable? Are we able to run a report of our notes for the week/month and have the person sign that?

A. Signatures of the person or authorized representative (guardian) and the employee of the agency that provided the service must be included with each documentation of a billable service. The proposed ideas in this question are not compliant with the law.

Q. Can we create our own attestation form that covers contact/services over the week or month that specifies the dates of service, units and whether direct/indirect and remote that requires the employee and person to sign as long as our case notes cover all other documentation requirements.

A. No. Signatures of the person or authorized representative (guardian) and the employee of the agency that provided the service must be included with each documentation of a billable service. Documentation requirements are located under Billing in the Housing Stabilization Services section of the MHCP Provider Manual.

Q. Is there a specific form for the new documentation requirements?

A. No. There is no specific form. It is the provider's responsibility to ensure their record keeping system complies with all documentation requirements. Documentation requirements are located under Billing in the Housing Stabilization Services section of the MHCP Provider Manual.

Q. What is the required timeframe to capture the person's signature? How much time after the service delivery does that provider have to capture the signature?

A. DHS recommends that providers obtain signatures at the time of service. Signatures should be obtained before submitting claims for billable services.

Q. Are documented verbal approvals acceptable?

A. No. Verbal approvals are not acceptable. Providers will need to work with the person to obtain required signatures.

Q. Does an Electronic Visit Verification (EVV) system with a PIN entered by the person comply with the new requirements for statements and signatures?

A. No. Minnesota's EVV is used for documenting services for activities of daily living (ADLs) and/or instrumental activities of daily living (IADLs), not for Housing Stabilization Services. With the new requirements signatures of the employee, person or authorized representative (guardian) and statement(s) must be included with each documentation of a billable service.

Q. Is reviewing documentation contemporaneously with the person and obtaining signatures allowed as billable time if it is completed at the same time of service delivery?

A. Yes. Concurrent documentation is billable since documentation and obtaining the person's signature is required as part of the service. Concurrent documentation involves completing the paperwork while with the person and with the person's participation. Please note: Time completing documentation outside of service delivery without the person's participation is not billable.

Q. What is the recommendation for verifying services when a person served is declining to sign, or in situations where mental health status may limit the person's ability to sign a document at the time that services are being provided?

A. Signature of the person or authorized representative (guardian) and the employee of the agency that provided the service must be included with each documentation of a billable service. If a person is unable or unwilling to sign, please email HSS staff at dhshousingstabilization@state.mn.us.

Q. What alternatives exist if a person cannot physically sign during that billing period?

A. Signatures should be obtained before submitting claims for billable services. If a person is unable to sign, please contact HSS staff at dhshousingstabilization@state.mn.us.

Q. What if the person is homeless and doesn't have a mailing address and a provider would like to mail documentation?

A. Providers serving people who are unsheltered should use a general delivery address or a person's chosen mailing address (if they have one). Providers will need to work with the person to obtain required signatures and ensure that the documents are signed and returned.

Q. What if a person doesn't have electronic means of communication (email, text, etc.)?

A. Electronic signatures are not allowed. DHS requires ink signatures for Housing Stabilization Services. Providers will need to work with the person to obtain required signatures. Signatures of the person or authorized representative (guardian) and the employee of the agency that provided the service must be included with each documentation of a billable service.