

December 19, 2025

Scott Logan
Social Security Administration
Office of Income Security Programs
Keys Section
2518 Robert M. Ball Building
6401 Security Boulevard
Baltimore, Maryland 21235

Dear Mr. Logan:

I have received your request for Iowa's federal fiscal year (FFY) 2026 certification of compliance with Section 1616(e) of the Social Security Act (the Keys Amendment).

Iowa Department of Health and Human Services (HHS) has been designated as the state agency responsible for overseeing compliance with Section 1616(e) of the Social Security Act, the Keys Amendment. This letter is for the federal fiscal year (FFY) 2026. It certifies that the State of Iowa has established, maintains, and ensures the enforcement of standards for categories of living arrangements in which significant numbers of Supplementary Security Income (SSI) recipients reside or are likely to reside.

The Department of Health and Human Services has the responsibility to oversee standards for the following living arrangements:

- Children's foster family homes
- Community supervised apartment living arrangements
- Adult family life homes
- Supported community living arrangements under the Medicaid Home and Community-Based Services (HCBS) programs, including:
 - Intellectual Disability (ID) waiver
 - Brain Injury (BI) Waiver

- Home-based Habilitation Arrangements under the Medicaid State Plan HCBS

The Department of Inspections, Appeals, and Licensing (DIAL) has the responsibility to oversee standards for the following living arrangements:

- Nursing facilities
- Residential Care Facilities (RCF)
- Elderly family homes
- Elder group home programs

Complete copies of the applicable rules or standards for each department were submitted to you in 1995, and changes have been submitted annually since then. We believe we are in full compliance with Section 1616(e).

Summary of Iowa Administrative Rule Changes for Medicaid Impacting the Department of Health and Human Services (HHS)

Iowa Governor Kim Reynolds implemented Executive Order 10 effective January 1, 2023. The Executive Order directs all State of Iowa agencies to review the Iowa Administrative Rule and promulgate it as specified in the Executive Order 10, no later than December 31, 2026. HHS began its scheduled review in January 2024, and Iowa Administrative Code 441 Chapters 36, 54, 81 and 82 were repromulgated. A copy of Executive Order 10 and the updated chapters of Iowa Administrative Code are attached.

Summary of Iowa Administrative Rule Changes for Iowa Department of Inspections, Appeals, and Licensing (DIAL)

During the federal fiscal year 2025, DIAL has not implemented any changes to its administrative rules governing health care providers regulated by the Department's Health Facilities Division.

Residential Care Facility Closures Fiscal Year 2025

Facility	Type	Capacity	City	Date of Closure	Reason
Arch II	RCF-3-5	5	Clinton	6/30/25	Transition to Waiver
Arch IV	RCF-3-5	5	Clinton	6/30/25	Transition to Waiver

New Residential Care Facilities Fiscal Year 2025

Iowa added two new residential care facilities, totaling 10 new beds, in fiscal year 2025.

Facility	Type	Capacity	City	Open Date
NeuroRestorative-Pro Farmer	RCF-3-5	5	Cedar Rapids	2/22/25
Mentor ABI, LLC	RCF-3-5	5	Bondurant	4/21/25

If you need additional information, please contact Robert Payne, LTSS Policy Program Manager, Iowa Medicaid, Bureau of Long Term Services and Supports, at (515) 204-3324 or Robert.Payne@HHS.Iowa.Gov.

Sincerely,

12/29/2025



Rebecca Curtiss
Medicaid Deputy Director of Operations

Cc: Iowa Department of Inspections, Appeals, and Licensing Jeremiah Junker
Iowa Department of Health and Human Services, Iowa Medicaid, Robert Payne