



## COLORADO

Department of Health Care  
Policy & Financing

Community Living Office  
1570 Grant Street  
Denver, CO 80203

**To:** All Stakeholders

**From:** Brittani Trujillo, Case Management Services Coordinator

**Date:** July 6, 2016

**Subject:** COMMUNICATION BRIEF – Implementation Plan for Conflict-Free Case Management

**Purpose:**

To provide stakeholders with the Department of Health Care Policy and Financing's (Department) plan to implement Conflict-Free Case Management (CFCM) in Colorado for Home and Community Based Services (HCBS) waivers.

**Background:**

In March of 2014 the Federal Centers for Medicare and Medicaid Services (CMS) released a new rule that addresses conflict of interest related to case management, promoting a nationwide systemic change for Home and Community Based Services (HCBS). The final rule was effective March 17, 2014. Additionally, the Colorado General Assembly passed House Bill 15-1318, requiring the Department to develop a plan to implement Conflict Free Case Management for individuals receiving services through an HCBS waiver. Pursuant to the legislation, this plan was submitted to the Joint Budget Committee (JBC) on July 1, 2016.

**Procedure:**

The Department engaged with a broad base of stakeholders and conducted several steps to develop the CFCM implementation plan. A financial analysis was conducted of all 20 Community Centered-Boards (CCB), along with on-site reviews with five CCBs to gain additional information related to CCB structure and financing. Additionally, stakeholder meetings were facilitated with individuals, families, guardians, advocates, CCBs, providers, SEPs, and others to obtain input for the development of the plan and feedback on the draft plan. Other states were also researched to discern their steps for complying with federal regulation. Upon completion of this work, an implementation plan was developed. The plan was submitted to the Joint Budget Committee on July 1, 2016 and is attached for your reference.



**Attachments:**

Colorado Conflict-Free Case Management for Home and Community Based Services – Implementation Plan

**Contact Person:**

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