

# Stakeholder Engagement for Day Program Services for HCBS Waivers - Day Habilitation

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Presented by: Candace Bailey, Kyra Acuna  
& John Barry



**COLORADO**

Department of Health Care  
Policy & Financing

# Our Mission

Improving health care access and outcomes for the people we serve while demonstrating sound stewardship of financial resources



# Purpose of Meeting:

- To engage stakeholders on proposed Day Habilitation changes in response to COVID-19
- To propose options for flexible service delivery of Specialized Habilitation (SH) and Supported Community Connections (SCC) services
- To receive feedback on proposed approach to Day Habilitation services



# Agenda

1. Review October 1<sup>st</sup> Stakeholder Meeting
2. Review current SH & SCC utilization data
3. Discuss new proposed rate structure, limitations and options for tiered approach to SH
4. Discuss proposed rates, limitations, and options for tiered approach to SCC
5. Discuss proposed monthly spending caps for SH & SCC combined
6. Receive feedback on proposal & determine which approach would work best for stakeholders
7. Determine next steps

# October 1<sup>st</sup> Meeting

- PowerPoint PDF and recording on [LTSS COVID-19 Response webpage](#)
- Discussed proposed 3-tier structure for SH
- Proposed draft rates & limitations by SIS level
- Received feedback on proposal and draft rates
- Discussed a similar 3-tiered structure for SCC
- Received feedback on proposed 3-tier structure



# Current Utilization Figures - SH

SIS Level & Rate	# of Members	Median Units	Weekly Expenditure
1 - \$2.57	633	22	\$35,790
2 - \$2.83	1,132	35	\$112,125
3 - \$3.15	736	35	\$81,144
4 - \$3.71	690	38	\$97,276
5 - \$4.59	884	39	\$158,245
6 - \$6.59	577	35	\$133,085
7 - \$10.38	135	55	\$77,072
<b>Total</b>		<b>259</b>	<b>\$694,737</b>

\*Based on PARs from FY 2018-19



# Proposed 3-Tier Structure to SH

- Tier 1 - Virtual Services Only
  - Slightly lower reimbursement rate
  - Stakeholder feedback suggested a preference for 1 rate for all and not by SIS level
- Tier 2 - Current Service Delivery Model
  - Services provided as they were pre-pandemic
  - Reimbursement rate remains as is
- Tier 3 - Individual, 1:1 SH
  - Reimbursement rate would be higher
  - Lower weekly maximum for number of hours
  - Stakeholder feedback suggested a preference for 1 rate for all and not by SIS level

# 3-Tier Structure SH Rates

SIS Level	Tier 1 – Virtual Only*	Tier 2 – Current Practice	Tier 3 – Individual*
Level 1	\$2.57	\$2.57	\$5.36
Level 2		\$2.83	
Level 3		\$3.15	
Level 4		\$3.71	
Level 5		\$4.59	
Level 6		\$6.59	
Level 7 – DD waiver only		\$10.38	

**\*Proposed draft rates per 15-minute unit**





# Proposed 3-Tier SH Limits

- Must remain budget neutral
- Budget set by General Assembly for FY 20-21 accounted for utilization reductions due to COVID-19
- No flexibility in the current budget for rate increases
- These limits are also combined with SCC, PreVoc, and Supported Employment



# Proposed 3-Tier SH Limits cont.

- Tier 1 - no maximum other than yearly unit cap
- Tier 2 - maintains current average weekly/monthly limits - based on yearly unit cap
- Tier 3 - maximum of 5 hours/20 units a week
- Stakeholder feedback expressed the need for Tier 1 & 2 to be able to be combined within same week
- Limit would need to be set for Tier 1 & Tier 3 provided in the same week



# Feedback on 3-Tier SH

- What questions or concerns do stakeholders have about this proposed approach?
- With the weekly limits needing to be quite low, do you feel Tier 3, 1:1 SH, is worth pursuing?
- Do you feel SH needs to have a long-term telehealth option?
- What obstacles do you see for members and providers trying to implement this 3-tier approach?

# Current Utilization Figures - SCC

SIS Level & Rate	# of Members	Median Units	Weekly Expenditure
1 - \$3.13	1,280	21	\$84,134
2 - \$3.42	1,618	34	\$188,141
3 - \$3.87	919	36	\$128,035
4 - \$4.44	869	38	\$146,618
5 - \$5.35	1,071	40	\$229,194
6 - \$7.03	716	38	\$191,272
7 - \$10.38	63	23	\$15,041
<b>Total</b>		<b>230</b>	<b>\$982,435</b>

\*Based on PARs from FY 2018-19



# Proposed 3-Tier Structure to SCC

- Tier 1 - Virtual SCC services only
  - Slightly lower reimbursement rate
  - Stakeholder feedback suggested a preference for 1 rate for all and not by SIS level
- Tier 2 - Current practice and rate
- Services provided as they were pre-pandemic
  - Reimbursement rate remains as is
- Tier 3 - 1:1 in-person SCC
  - Reimbursement rate would be higher
  - Lower weekly maximum for number of hours
  - Stakeholder feedback suggested a preference for 1 rate for all and not by SIS level

# 3-Tier Structure SCC Rates

SIS Level	Tier 1 – Virtual Only*	Tier 2 – Current Practice	Tier 3 – Individual*
Level 1	\$3.13	\$3.13	\$9.08
Level 2		\$3.42	
Level 3		\$3.87	
Level 4		\$4.44	
Level 5		\$5.35	
Level 6		\$7.03	
Level 7 – DD waiver only		\$10.48	

\*Proposed draft rates per 15-minute unit



# Proposed Limits for SCC

- Tier 1 - no maximum other than yearly unit cap
- Tier 2 - maintains current average weekly/monthly limits - based on yearly unit cap
- Tier 3 - maximum of 2 hours/8 units a week
- Stakeholder feedback expressed the need for Tier 1 & 2 to be able to be combined within same week
- Limit would need to be set for Tier 1 & Tier 3 provided in the same week

# Feedback on 3-Tier SCC

- What questions or concerns do stakeholders have about this proposed approach?
- With the weekly limits needing to be quite low, do you feel Tier 3, 1:1 SCC, is worth pursuing?
- Do you feel SCC needs to have the option to be provided via telehealth, long-term?
- What obstacles do you see for members and providers trying to implement this 3-tier approach?





# Monthly Spending Limit

- Alternative idea - using a monthly dollar amount limit instead of a unit limit
- Only feasible if the Department moves forward with the 3-tier structure to both SH and SCC
- All Day Habilitation services, SH and SCC, would be combined under one monthly dollar limit by SIS level

# Estimated Monthly Spending Limit for Day Habilitation

SIS Level	Monthly Limit	FY 18-19 Mean Annual Units	FY 18-19 Average Monthly Expend per Utilizer
1	\$723	2,141	\$687
2	\$1,231	3,068	\$1,164
3	\$1,576	3,328	\$1,476
4	\$1,886	3,497	\$1,769
5	\$2,327	3,549	\$2,176
6	\$2,963	3,383	\$2,756
7	\$3,545	3,454	\$3,540

For both SH and SCC combined



# Which Option Would Work Best?

- Day Habilitation services options long-term:
  - Move forward with the 3-tier structure to Day Habilitation, including a single rate for Tier 1 (virtual services), using the current rate for Tier 2 (current Day Hab practice broken out by SIS level), and a single rate for Tier 3 (1:1 service).
  - 3 tier structure to Day Hab (virtual, current practice, and 1:1), however instead of limiting both SH and SCC with a unit limit, Day Hab services would have a monthly dollar cap limit.
- Please vote now. Link in the chat box. Please select only 1 “yes” under SH and only 1 “yes” under SCC.

# Next Steps

- Submit additional questions and feedback to [HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)
- Once approved, the Department will publish an Operational Memo outlining the new structure for Day Habilitation Services
- If approved, the Department will draft waiver and regulation changes to incorporate the new structure
- If approved, the proposed changes will go out for public comment



# Questions?



# Contact Info

[HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)



# Thank you!

