

Colorado Community First Choice (CFC) vs. Adult Home and Community-Based Services (HCBS) Waivers Comparison Chart

The purpose of this document is to demonstrate the difference between Colorado Adult Home and Community-Based Services Waivers (1915c/HCBS) and Community First Choice Option (1915k/CFC), and what future home and community-based services will look like under waivers versus CFC in 2025.

CFC is not finalized with the Centers for Medicare and Medicaid Services (CMS), Colorado Code of Regulations, or Colorado State Statute. This document demonstrates what CFC would currently look like when implemented and is **subject to change**.

Furthermore, the information on HCBS waivers is taken directly from the [Adult HCBS Waiver Comparison chart](#) which is updated periodically, and this document will be updated to reflect those changes.

The "What services are available?" section lists services that are planned to move into CFC from the HCBS Waivers and appear in **bold text** under each waiver column. The service titled "Wellness Education Benefit" listed under each waiver indicates a new service that the Department of Health Care Policy and Financing is seeking to put in all waivers in 2025. The CFC column provides the full list of services that are intended to be offered under CFC. Each member will need to have an assessed need to receive the service.

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Name of Waiver	Community First Choice (CFC) – State Plan Draft	Persons with Brain Injury Waiver (HCBS-BI)	Community Mental Health Supports Waiver (HCBS-CMHS)	Complementary and Integrative Health Waiver (formerly SCI) (HCBS-CIH)	Persons with Developmental Disabilities Waiver (HCBS-DD)	Persons who are Elderly, Blind and Disabled Waiver (HCBS-EBD)	Supported Living Services Waiver (HCBS-SLS)
What is the primary purpose of this waiver/ program?	The Community First Choice Option allows states to provide home and community-based attendant services and supports to eligible Medicaid members under the State Plan on a statewide basis. Through CFC, members would have the option to direct their attendant care services, or to receive services through an agency	To provide a home or community-based alternative to hospital or specialized nursing facility care for persons with brain injury	To provide a home or community-based alternative to nursing facility care for persons with major mental illness	To provide a home or community-based alternative for people with a spinal cord injury, multiple sclerosis, a brain injury, spina bifida, muscular dystrophy, or cerebral palsy with the inability to walk independently	To provide to persons with developmental disabilities services and supports which allow them to continue to live in the community	To provide a home or community-based alternative to nursing facility care for persons who are elderly, blind, and living with a disability	To provide persons with developmental disabilities supported living services in the person's home or community
What ages are served?	All ages	Age 16 and older	Age 18 and older	Age 18 or older	Age 18 and older	Age 18 and older	Age 18 and older
Who is served?	Colorado Medicaid members that meet an institutional level of care and have an assessed need for CFC services	Persons with brain injury as defined in the Colorado Code of Regulations with specific diagnostic codes	Persons with a diagnosis of major mental illness as defined in the Colorado Code of Regulations with specific DSM-IV diagnostic codes	Persons with a qualifying condition of a spinal cord injury, multiple sclerosis, a brain injury, spina bifida, muscular dystrophy, or cerebral palsy with the inability for independent ambulation as result of one of these conditions	Persons who are in need of services and supports 24 hours a day that will allow them to live safely and participate in the community	Elderly persons with a functional impairment (aged 65+) or blind or physically disabled persons (aged 18-64)	Persons, who can either live independently with limited supports or who, if they need extensive supports, are already receiving that high level of support from other sources, such as family
What is the Level of Care Requirement?	Institutional level of care including: <ul style="list-style-type: none"> Nursing facility Intermediate care facility for individuals with intellectual disabilities Institution providing psychiatric services for individuals under age 21 Institution for mental diseases for individuals age 65 or over 	Hospital or nursing facility level of care	Nursing facility level of care	Hospital or nursing facility level of care	Intermediate Care Facility for Individuals with Intellectual Disabilities	Nursing facility level of care	Intermediate Care Facility for Individuals with Intellectual Disabilities
What waiver/ program services are available?	<ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) – Personal Care, Homemaker, Health Maintenance Activities In-Home Support Services (IHSS) – Personal Care, Homemaker, Health Maintenance Activities Personal Care Health Maintenance Activities Homemaker Services Medication Reminder Personalized Emergency Response System (PERS) Remote Supports Transition Set Up Home Delivered Meals <p>Additional service being added:</p> <ul style="list-style-type: none"> Acquisition, Maintenance, and Enhancement of Skills (AME) 	<ul style="list-style-type: none"> Adult Day Services Behavioral Management and Education Day treatment Home Modification Independent Living Skills Training (ILST) Mental Health Counseling Non-Medical Transportation Peer Mentorship Respite Specialized Medical Equipment and Supplies Substance Abuse Counseling Supported Living Program Transition Set Up Transitional Living Program Wellness Education Benefit <p>After CFC is implemented, the following will only be available through CFC:</p> <ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Homemaker Services (with Remote Supports options) Medication Reminder Personal Care (with Remote Supports options) Personal Emergency Response System (PERS) 	<ul style="list-style-type: none"> Adult Day Services Alternative Care Facilities Home Modifications Life Skills Training Non-Medical Transportation Peer Mentorship Respite Transition Set Up Wellness Education Benefit <p>After CFC is implemented, the following will only be available through CFC:</p> <ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Homemaker Services (with Remote Supports options) Personal Care (with Remote Supports options) Personal Emergency Response System (PERS) 	<ul style="list-style-type: none"> Adult Day Services Complementary and Integrative Health Services (Acupuncture, Chiropractic, Massage) Home Modifications Life Skills Training Non-Medical Transportation Peer Mentorship Respite Transition Set Up Wellness Education Benefit <p>After CFC is implemented, the following will only be available through CFC:</p> <ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Homemaker Services (with Remote Supports options) In-Home Support Services (IHSS) Medication Reminder Personal Care (with Remote Supports options) Personal Emergency Response System (PERS) 	<ul style="list-style-type: none"> Behavioral Services Day Habilitation (Specialized Habilitation, Supported Community Connections) Dental Services Non-Medical Transportation Peer Mentorship Prevocational Services Residential Habilitation Services (24-hour individual or group) Specialized Medical Equipment and Supplies Supported Employment Transition Set Up Vision Services Wellness Education Benefit <p>After CFC is implemented, the following service will only be available through CFC:</p> <ul style="list-style-type: none"> Home Delivered Meals <p>(Note: Residential Habilitation offers per diem services and no additional services will be moved from DD into CFC.)</p>	<ul style="list-style-type: none"> Adult Day Services Alternative Care Facilities Home Modifications Life Skills Training Non-Medical Transportation Peer Mentorship Respite Specialized Medical Equipment and Supplies Transition Set Up Wellness Education Benefit <p>After CFC is implemented, the following will only be available through CFC:</p> <ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Homemaker Services (with Remote Supports options) In-Home Support Services (IHSS) Medication Reminder Personal Care (with Remote Supports options) Personal Emergency Response System (PERS) 	<ul style="list-style-type: none"> Assistive Technology Behavioral Services Day Habilitation Services (Specialized Habilitation, Supported Community Connections) Dental Services Homemaker Enhanced (extraordinary cleaning) Home Modifications Life Skills Training Mentorship Non-Medical Transportation Peer Mentorship Prevocational Services Professional Services (Includes Hippotherapy, Massage and Movement Therapy) Respite Specialized Medical Equipment and Supplies Supported Employment Transition Set Up Vehicle Modifications Vision Services Wellness Education Benefit <p>After CFC is implemented, the following will only be available through CFC:</p> <ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) Health Maintenance Activities Home Delivered Meals

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							<ul style="list-style-type: none"> • Homemaker Basic Services (with Remote Supports options) • Homemaker Enhanced (Habilitative tasks) • Personal Care (with Remote Supports options) • Personalized Emergency Response System (PERS)
Who selects the service providers?	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian
Waiver/program website	hcpf.colorado.gov/community-first-choice-option	hcpf.colorado.gov/brain-injury-waiver-bi	hcpf.colorado.gov/community-mental-health-supports-waiver-cmhs	hcpf.colorado.gov/complementary-integrative-health-waiver-cih	hcpf.colorado.gov/developmental-disabilities-waiver-dd	hcpf.colorado.gov/elderly-blind-disabled-waiver-ebd	hcpf.colorado.gov/supported-living-services-waiver-sls