

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 pending other projects** that the Department of Health Care Policy and Financing is working on, such as Case Management Redesign.

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 CFC column provides the full list of services that are intended to be placed under CFC at this time.

Name of Waiver	Community First Choice (CFC) – State Plan DRAFT	HCBS Waiver for Persons with Brain Injury (HCBS-BI)	Community Mental Health Supports Waiver (HCBS-CMHS)	Complementary and Integrative Health Waiver (formerly SCI) (HCBS-CIH)	HCBS Waiver for Persons with Developmental Disabilities (HCBS-DD)	HCBS Waiver for Persons who are Elderly, Blind and Disabled (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 state-wide 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 for independent ambulation	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?	Individuals of all ages	Age 16 and older	Age 18 and older	Age 18 and older	Age 18 and older	Age 18 and older	Age 18 and older
Who is served?	Colorado Medicaid members that meet an institutional level	Persons with brain injury as defined in the Colorado Code of	Persons with a diagnosis of major mental illness as	Persons with a qualifying condition of a spinal cord	Persons who are in need of services and supports 24 hours a	Elderly persons with a functional impairment (aged	Persons, who can either live independently with

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	of care and have an assessed need for CFC services	Regulations with specific diagnostic codes	defined in the Colorado Code of Regulations with specific DSM-IV diagnostic codes	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	day that will allow them to live safely and participate in the community	65+) or blind or physically disabled persons (aged 18-64)	limited supports or who, if they need extensive supports, are already receiving that high level of support from other sources, such as family
Is there a waiting list?	No	No	No	No	Yes	No	No
What is the Level of Care Requirement?	Institutional level of care including: <ul style="list-style-type: none"> • Long-term care hospital • Nursing facility • Intermediate care facility for individuals with intellectual disabilities • Institution providing 	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

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	psychiatric services for individuals under age 21 <ul style="list-style-type: none"> Institution for mental diseases for individuals age 65 or over 						
What waiver/program services are available?	<ul style="list-style-type: none"> Consumer Directed Attendant Support Services (CDASS) In-Home Support Services (IHSS) Health Maintenance Activities Home Delivered Meals Homemaker Services Life Skills Training (LST) Medication Reminder Peer Mentorship Personal Care Personalized Emergency Response System 	<ul style="list-style-type: none"> Adult Day Services Behavioral Management & Education Consumer Directed Attendant Support Services (CDASS) Day treatment Home Delivered Meals Home Modification Independent Living Skills Training (ILST) Medication Reminder Mental Health Counseling Non-Medical 	<ul style="list-style-type: none"> Adult Day Services Alternative Care Facilities Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Home Modifications Homemaker Services Life Skills Training Medication Reminder Non-Medical Transportation Peer Mentorship 	<ul style="list-style-type: none"> Adult Day Services Complementary and Integrative Health Services (Acupuncture, Chiropractic, Massage) Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Home Modifications Homemaker Services In-Home Support Services (IHSS) Life Skills 	<ul style="list-style-type: none"> Behavioral Services Day Habilitation (Specialized Habilitation, Supported Community Connections) Dental Services Home Delivered Meals Non-Medical Transportation Peer Mentorship Prevocational Services Residential Habilitation Services (24-hour individual or group) Specialized Medical Equipment & 	<ul style="list-style-type: none"> Adult Day Services Alternative Care Facilities Consumer Directed Attendant Support Services (CDASS) Home Delivered Meals Home Modifications Homemaker Services In-Home Support Services (IHSS) Life Skills Training Medication Reminder Non-Medical Transportation 	<ul style="list-style-type: none"> Assistive Technology Behavioral Services Consumer Directed Attendant Support Services (CDASS) Day Habilitation Services (Specialized Habilitation, Supported Community Connections) Dental Services Health Maintenance Activities Home Delivered Meals Home Modifications Homemaker

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	(PERS) <ul style="list-style-type: none"> Remote Supports Transition Set Up Additional service being added: <ul style="list-style-type: none"> Acquisition, Maintenance, and Enhancement of Skills (AME) 	Transportation <ul style="list-style-type: none"> Peer Mentorship Personal Care Personalized Emergency Response System (PERS) Remote Supports Respite Care Specialized Medical Equipment & Supplies Substance Abuse Counseling Supported Living Program Transition Set Up Transitional Living Program <i>Wellness Benefit</i> 	<ul style="list-style-type: none"> Personal Care Personal Emergency Response System (PERS) Remote Supports Respite Care Transition Set Up <i>Wellness Benefit</i> 	Training <ul style="list-style-type: none"> Medication Reminder Non-Medical Transportation Peer Mentorship Personal Care Personal Emergency Response System (PERS) Remote Supports Respite Care Transition Set Up <i>Wellness Benefit</i> 	Supplies <ul style="list-style-type: none"> Supported Employment Transition Set Up Vision Services <i>Wellness Benefit</i> 	<ul style="list-style-type: none"> Peer Mentorship Personal Care Personal Emergency Response System (PERS) Remote Supports Respite Care Transition Set Up <i>Wellness Benefit</i> 	Services <ul style="list-style-type: none"> Life Skills Training Mentorship Non-Medical Transportation Peer Mentorship Personal Care Personalized Emergency Response System (PERS) Prevocational Services Professional Services (Includes Hippotherapy, Massage & Movement Therapy) Remote Supports Respite Services Specialized Medical Equipment & Supplies Supported Employment

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							<ul style="list-style-type: none"> • Transition Set Up • Transportation • Vehicle Modifications • Vision services • <i>Wellness Benefit</i>
Who selects the service providers?	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian	Member/Guardian
What state/federal organizations administer this program?	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)	Department of Health Care Policy and Financing Centers for Medicare and Medicaid Services (CMS)
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
State contact	303-866-3580 hcpf_cfc@state.co.us	303-866-3684 hcbswaivers@state.co.us	303-866-3684 hcbswaivers@state.co.us	303-866-3684 hcbswaivers@state.co.us	303-866-3684 hcbswaivers@state.co.us	303-866-3684 hcbswaivers@state.co.us	303-866-3684 hcbswaivers@state.co.us