

Colorado Community First Choice (CFC) vs. Children’s Home and Community-Based Services (HCBS) Waiver Comparison Chart

The purpose of this document is to demonstrate the difference between Colorado Children’s 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. Additionally, the right column of this document reflects the merger of the HCBS and CLLI waivers is proposed to occur 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 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 and the Wellness Benefit.**

Furthermore, the information on HCBS waivers is taken directly from the [Children’s 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 Benefit"** listed under each waiver indicates a new service that will be available to HCBS waiver members in 2024, and all other waivers in 2025. These are the services that will be available under CFC, but each member will need to have an assessed need to receive the service. 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) Draft	Children’s Extensive Support Waiver (HCBS-CES)	Children’s Home and Community Based Services Waiver (HCBS-CHCBS)	Children’s Habilitation Residential Program Waiver (HCBS-CHRP)	Children with Life-Limiting Illness Waiver (HCBS-CLLI)	New Children with Complex Health Needs Waiver (CwCHN) Draft
What is the primary purpose of this waiver?	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 Health First Colorado benefits in the home or community for children with developmental disabilities or delays that are most in need due to the severity of their disability Children must meet additional targeted criteria	To provide Health First Colorado benefits in the home or community for children with significant medical needs and who are at risk for institutional care in an acute hospital or skilled nursing facility	To provide Health First Colorado benefits in the home or community for children and youth who have an intellectual or developmental disability and very high needs, which put them at risk for out-of-home-placement Children must be at risk for institutionalization	To provide Health First Colorado benefits in the home for children with a life-limiting illness To allow the family to seek curative treatment while the child is receiving palliative or hospice care	To provide Health First Colorado benefits in the home or community for children with significant medical needs and who are at risk for institutional care in an acute hospital or skilled nursing facility and/or; To provide Health First Colorado benefits in the home for children with a life-limiting illness To allow the family to seek curative treatment while the child is receiving palliative or hospice care
What ages are served?	Individuals of all ages	Birth through age 17	Birth through age 17	Birth through age 20	Birth through age 18	Birth through 18
Who is served?	Colorado Medicaid members that meet an institutional level of care and have an assessed need for CFC services	Children with intensive behavioral or medical needs who are at risk of institutionalization Children, birth through age 4, must have a developmental delay Children, 5 through 17, must have a developmental disability	Children in the home at risk of nursing facility or hospital placement	Children and youth ages 0-20 years, who have an intellectual or developmental disability and intensive behavioral or medical support needs that put them at risk of out-of-home placement. The child or youth must meet the Intermediate Care Facility for Individuals with Intellectual Disabilities definition.	Children with a life-limiting illness who can be safely cared for in the home and who are at risk of institutionalization in a hospital	Children in the home at risk of nursing facility or hospital placement, and; Children with a life-limiting illness who can be safely cared for in the home and who are at risk of institutionalization in a hospital
Is there a waiting list?	No	No	No	No	No	No
What is the enrollment cap on the program?	None	None	None	None	None	None
What is the Level of Care Requirement?	Institutional level of care including: • Long-term care hospital • Nursing facility • Intermediate care facility for individuals with intellectual disabilities • Institution providing services for individuals under age 21	Intermediate Care Facility for Individuals with Intellectual Disabilities	Nursing facility or hospital level of care	Intermediate Care Facility for Individuals with Intellectual Disabilities	Hospital level of care	Nursing Facility or Hospital level of care
What waiver 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 Homemaker Home Delivered Meals Medication Reminders Personal Care Personal Emergency Response System (PERS) Remote Supports Transition Set Up <p>Additional Task being added under homemaker</p> <ul style="list-style-type: none"> Acquisition, Maintenance, and Enhancement of Skills (AME) 	<ul style="list-style-type: none"> Adapted Therapeutic Recreation and Fees Assistive Technology Community Connector Home Accessibility Adaptations Homemaker Services Parent Education Professional Services (includes Hippotherapy, Massage and Movement Therapy) Respite Care Specialized Medical Equipment and Supplies Vehicle Adaptations Youth Day Wellness Benefit 	<ul style="list-style-type: none"> Case Management In-Home Support Services (IHSS) <ul style="list-style-type: none"> Health Maintenance Activities Only Wellness Benefit 	<ul style="list-style-type: none"> Community Connector Services Habilitation Services <ul style="list-style-type: none"> Cognitive Services* Communication Services* Emergency Assistance Training* Independent Living Training* Personal Care Services* Self-Advocacy Training* Supervision Services* Travel Services* Intensive Support Services <ul style="list-style-type: none"> Wraparound Facilitator and Plan Prevention/Monitoring Child and Youth Mentorship Professional Services (Hippotherapy, Massage and Movement Therapy) Respite Transition Support Services <ul style="list-style-type: none"> Wraparound Facilitator and Plan Prevention/Monitoring Child and Youth Mentorship Wellness Benefit <p>* Services are not billed separately but under the habilitation services and are part of residential services.</p>	<ul style="list-style-type: none"> Counseling/Bereavement Services Expressive Therapy Massage Therapy Palliative/Supportive Care Respite Therapeutic Life Limiting Illness Support Wellness Benefit 	<ul style="list-style-type: none"> Counseling/Bereavement Services Expressive Therapy Massage Therapy Palliative/Supportive Care Respite Therapeutic Life Limiting Illness Support Wellness Benefit
Who selects the service providers?	Member/Legal Guardian/Family	Member Case Manager Family or legal guardian	Case Manager Family	Member Case Manager Family or Legal Guardian	Case Manager Family or legal guardian	Member Case Manager Family or legal guardian
What state/federal organizations administer this program?	Department of Health Care Policy and Financing; Centers for Medicare and Medicaid Services	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 website	hcpf.colorado.gov/community-first-choice-option	hcpf.colorado.gov/childrens-extensive-support-waiver-ces	hcpf.colorado.gov/childrens-home-and-community-based-services-waiver-chcbs	hcpf.colorado.gov/childrens-habilitation-residential-program-waiver-chrp	hcpf.colorado.gov/children-life-limiting-illness-waiver-clli	TBD
State contact	303-866-3580 HCPF_CFC@state.co.us	303-866-3684 HCPF_HCBS_Questions@state.co.us	303-866-3684 HCPF_HCBS_Questions@state.co.us	303-866-3684 HCPF_HCBS_Questions@state.co.us	303-866-3684 HCPF_HCBS_Questions@state.co.us	303-866-3580 HCPF_CFC@state.co.us