



DRAFT - Adult IDD Waiver Redesign Stakeholders Parking Lot Items August 19, 2019

** At the August 16 Co-chair Meeting the Department agreed to categorize the parking lot log items for the stakeholders to understand how and when the Department addressed the items.*

*** A stakeholder suggested that if there are particular parking lot items that stakeholders would like prioritized to address, there should be a mechanism to flag these items.*

****The compiled Parking Lot Log is attached at the end of this document as originally maintained, showing the Parking Lot items by meeting date at which they were added.*

Category Key

Category 1: Answered in the Q&A Document (distributed June 18, 2019)

Category 2: Discussed at IDD Waiver Redesign Stakeholder Meeting

Category 3: Addressed in Draft Service and Coverage Standards for Residential Services or Personal Supports

Category 4: To Be Addressed in Another Venue



Category 1: Answered in the Q&A Document (distributed June 18th, 2019)

Parking Lot Item	Q&A Question Number/Response
<p>How will this redesign affect things more globally – i.e. rates and caps, are we creating dependencies?</p>	<p>Q&A Document Question #37 Q&A Document Question #52</p> <p>In addition, the Department’s policy intention with the new needs-based criteria for Residential Services and the expanded services array is to encourage more independence and more flexibility to choose from a menu of services.</p>
<p>Right now, HCPF rates are not due for re-consideration until “2017 plus 5 years.” We need improvement/increases in rates for an effective waiver redesign, and a discussion of any options to accomplish this.</p>	<p>Q&A Document Question #52</p>
<p>We never got an answer to whether, if a Core Service Budget Limit (eg: \$18,000) was used up, can the person tap into their Ancillary Services Budget Limit (eg: \$2700) and vice versa?</p>	<p>Q&A Document Question #37 Q&A Document Question #52</p> <p>In addition, the Department’s policy intention with the new needs-based criteria for Residential Services and the expanded services array is to encourage more independence and more flexibility to choose from a menu of services.</p>
<p>HCPF stated “no hard and fast rule” for a person’s needing a lot of Trach/Vent services in Residential Habilitation. So what Service and Coverage Standard wording can be added to cover that type of high need in Residential Habilitation?</p>	<p>Q&A Document Question #26</p>



Rolling PSS into Residential Services – would this be cheaper? To ask Bolton on June 18th	Q&A Document Question #18
Respite care added to Residential Services	Q&A Document Question #27
Day Service limitations	Q&A Document Question #50
Rates for Day Services	Q&A Document Question #52
Rates for all services	Q&A Document Question #37
Access to questions the Department has already received – should be available on the website	The Department has made available to stakeholders all stakeholder questions the Department has received, along with Department responses, regarding Residential Services and Personal Supports. The Department captured the questions and answers in the Q&A and document and the Parking Lot Log, which are both available on the Waiver Redesign Stakeholder website. Over the three years prior to this, the Department developed and facilitated an Online Forum to capture and make available all stakeholder questions and Department responses.
Question and answers done by May 30 th	Q&A is available on Department’s website, posted June 18 th , 2019
<ul style="list-style-type: none"> • How can we change HCPFs decision to collect a year of Consumer Directed Attendant Support Service (CDASS) usage data after the combined waiver is in effect, BEFORE adding the In-Home Support Service (IHSS) option as a benefit? • CDASS as a future agenda item • CDASS in Residential Services 	<p>Q&A Document Question #30</p> <p>There are few known examples nationwide of Residential Services having a CDASS model. Currently self-direction is available in Residential Habilitation in a limited way through Family Caregiver and choice of residential agency and Residential Habilitation service model. The IHSS self-direction model is discussed during PDPPC meetings and the Department welcomes stakeholder’s involvement in this public engagement. The Department must do further research on financial impacts associated with expanded implementation of the IHSS model</p>



	to ensure responsible stewardship of public funds. There is no set timeline (1 year or otherwise) established of collecting data or conducting this research.
Recruitment and retention of quality host home providers	Q&A Document Question #62. In addition, the Department is working on enhanced oversight by the Division of Housing – please refer to the Division of Housing and the Department’s stakeholder engagement websites for more information. https://www.colorado.gov/pacific/hcpf/OCL-stakeholder-engagement
Is it OK to pay both retainer payments AND another Medicaid service provider simultaneously?	There is a risk of duplicating Medicaid dollars. However, Yes, this is allowable. CMS permits and recommends the use of Retainer Payments. The Medicaid claims system would need updating in order to pay both retainer payments and a different Medicaid provider simultaneously. DDD had used Vacancy Factor payment methodologies historically without risk of duplication.

Category 2: Discussed at IDD Waiver Redesign Stakeholder Meeting

Parking Lot Item	Meeting Date	Discussion
Request for Bolton actuarial study and request for review with stakeholder group before it is distributed. Release of Bolton report and a stakeholder meeting to discuss changes and edits with HCPF budget staff	July 25, 2019 (stakeholder meeting)	The Department is meeting with waiver redesign stakeholders on September 24 th to discuss the Bolton cost model report. The Department published the report on the waiver redesign stakeholder website and distributed two weeks prior to the scheduled meeting. A Department budget representative will participate in this meeting. The cost model template and tool is designed to be flexible such that department staff can modify



		inputs to run new cost projections as determined necessary in the future.
Address parking lot issues – how and when	August 16, 2019 (co-chair meeting) August 26, 2019 (stakeholder meeting)	At the co-chair and the stakeholder meetings attendees discussed the process by which the Department will address the parking lot log items.
Case studies – how will individuals be affected (real life examples) and how will families be involved?	July 25, 2019 (stakeholder meeting)	Phase one case studies included aggregate trend analysis. Phase two of case studies will involve real life examples and will involve stakeholder volunteers.
HCPF has solicited emails from stakeholders on various issues. For waiver redesign transparency, all stakeholders need prompt access to issues in those emails.	August 26, 2019 (stakeholder meeting)	The Department offered to accept emails for those who want to provide specific language or that have language from another resource they want to share. See attached parking lot log below with dates and details of all issues identified by stakeholders, including through emails. As agreed to in the August 26 th meeting, emails sent from stakeholders to the Department regarding the Residential Services proposed Service and Coverage Standard (SCS) language will be distributed by John Barry to IDD Waiver Redesign stakeholders.
Since we still have Residential Habilitation to finish in Real-Time edits, may we get the TWO documents we got for Personal Support Services (PSS), a “working” document and a “tracker” (all	May 20, 2019 (co-chair meeting) June 18, 2019 (stakeholder meeting)	This input was received at the co-chair meeting and the Department responded accordingly and distributed the two documents “working” and “tracker” SCS’s for the June 18 and all subsequent stakeholder meetings.



comments whether incorporated or not) document?		
We need the final wording on Retainer Payments (for vacations, to ensure billing of time-duplicative services).	May 15, 2019 (stakeholder meeting) May 30, 2019 (stakeholder meeting) August 26, 2019 (stakeholder meeting)	Q&A Document #27 The Department is exploring mechanisms for billing with rates and systems staff and will revise Service Coverage and Standard language as necessary.
Copying and pasting from PSS to Residential Habilitation	May 30, 2019 (stakeholder meeting) June 18, 2019 (stakeholder meeting) July 25, 2019 (stakeholder meeting) August 26, 2019 (stakeholder meeting)	Per stakeholder suggestions, the Personal Support Services SCS content was copy and pasted to the Residential Services SCS and adapted further upon stakeholder review and live edits.
How are we going to give feedback to Q&A?	June 18, 2019 (stakeholder meeting)	Stakeholders had the opportunity to give feedback through the IDD waiver redesign mailbox: Hcpf_iddwaiverredesign@hcpf.state.co.us
Stakeholder co-chairs making policy decisions during planning meetings	May 20, 2019 (co-chair meeting) June 11, 2019 (co-chair meeting) July 16, 2019 (co-chair meeting) August 16, 2019 (co-chair meeting)	No policy decisions have been made during any co-chair meetings. Co-chair meetings are for stakeholder meeting agenda building purposes only.
Stakeholder contact information Sign-in sheet to include a "ok to contact" check box – John to check with legal	May 15, 2019 (stakeholder meeting) May 30, 2019 (stakeholder meeting) June 18, 2019 (stakeholder meeting) July 25, 2019 (stakeholder meeting)	The Departments legal director indicated that the "OK to contact" checkbox would conflict with HIPPA protections.
Receiving presentations ahead of time and not spending meeting time going over presentations – specifically Bolton	June 11, 2019 (co-chair meeting)	The Department sends meeting materials one week in advance to the IDD waiver redesign stakeholder distribution list as well as posts materials to the Department's website and Outlook invitation.



and HMA's presentations for June 18th meeting		
Health Services Coordination service – discuss at future meeting	May 30, 2019 (stakeholder meeting) June 18, 2019 (stakeholder meeting) July 25, 2019 (stakeholder meeting)	During live edits, the Department incorporated more detail specifying the Health Services Coordination component into the Residential Services SCS.
New definitions to be added to glossary. Clarity on definitions and terms	August 26, 2019 (stakeholder meeting)	Stakeholders to submit term definition recommendations to John Barry who will distribute them to all WRD stakeholders. The Department will incorporate into the appropriate SCS glossary which will be noted in the comments section of the SCS.
Individual Residential Supports Service (IRSS) discussion – changing the rule on home modification, requests for funding will have to go through the Department of Housing. HCPF staff are going to have to make a change in the Residential Habilitation document to reflect this.	May 15, 2019 (stakeholder meeting)	The Department will make a revision to the Residential Services SCS based on changes made to the current IRSS regulations.
New name for Day Services	May 15, 2019 (stakeholder meeting)	Community and Personal Engagement
Small group format for future meetings is difficult for webinar and phone participants	May 15, 2019 (stakeholder meeting)	The Department and stakeholders are operating on a consensus model. The group elected not to use small group formats.
Mutually exclusive table for redesigned services	May 15, 2019 (stakeholder meeting) May 30, 2019 (stakeholder meeting)	The mutually exclusive table was distributed and reviewed with stakeholders and is posted on the IDD Waiver Redesign website.
Real time note-taking and real time editing in the next meeting	May 15, 2019 (stakeholder meeting) May 30, 2019 (stakeholder meeting)	The Department implemented real time editing for the two remaining SCSs, Residential Services and



	<p>June 18, 2019 (stakeholder meeting) July 25, 2019 (stakeholder meeting) August 26, 2019 (stakeholder meeting)</p>	<p>Personal Supports. A stakeholder notetaker was established and also implemented.</p>
<p>No changes to documents unless we all agree on them and can see what they are</p>	<p>May 15, 2019 (stakeholder meeting) May 30, 2019 (stakeholder meeting) June 18, 2019 (stakeholder meeting) July 25, 2019 (stakeholder meeting) August 26, 2019 (stakeholder meeting)</p>	<p>The Department implemented real time editing for the two remaining SCSs, Residential Services and Personal Supports.</p>
<p>Written documentation of any decision the group makes</p>	<p>May 15, 2019 (stakeholder meeting) May 30, 2019 (stakeholder meeting) June 18, 2019 (stakeholder meeting) July 25, 2019 (stakeholder meeting) August 26, 2019 (stakeholder meeting)</p>	<p>The Department implemented real time editing for the two remaining SCSs, Residential Services and Personal Supports.</p>
<ul style="list-style-type: none"> • Adequate time to cover the scope of this work • Request to address remaining SCSs with live edits – will be discussed at next co-chair meeting • Future meetings 	<p>August 26, 2019 (stakeholder meeting) and please see the “Adult IDD Waiver Redesign Meeting Timeline”</p>	<p>The Department has heard from many family members about reviewing the remaining 12 SCSs with live edits. The Department will discuss this option with stakeholders during the September 24, 2019 meeting.</p>
<p>Are spouses OK to get paid for providing services?</p>	<p>August 26th, 2019 (stakeholder meeting)</p>	<p>No, as spouses are the Legally Responsible Person for adults they therefore cannot be paid. While the Family Caregiver Act (CO Rev Stat § 25.5-10-202 (2016)) defines family as including a spouse, the federal definition of Legally Responsible Person supersedes the state law allowing spouses to be paid to deliver services, therefore Legally</p>



		Responsible Persons (spouses) may not be paid to deliver IDD waiver services.
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Category 3: Addressed in Draft Service and Coverage Standards for Residential Services or Personal Supports

Parking Lot Item	Draft SCS Resolution
Role of licensed nurses in Residential Habilitation.	Residential Services SCS: Page 3, Service Inclusions section, bullet beginning with: "Health and Wellness Coordination services ..." Page 4, Service Inclusions section, bullet beginning with: "Assistance with routine health-related tasks ..."
Individual's mental health (whole health, not just physical health) needs throughout the SCS	Residential Services SCS: Page 3, Service Inclusions section, bullet beginning with: "Health and Wellness Coordination services ..."
Clarify the definition of Day Services between Residential Habilitation/Personal Supports and Community & Personal Engagement.	Residential Services SCS: Page 4, Service Inclusions section, bullet beginning with: "Assistance with routine health-related tasks ..."
Stakeholder meetings NEVER completed PSS whole review (Provider Specs; Member Directed Personal Supports). These NEED to be completed in real-time edits during a meeting.	Residential Services SCS: Page 8, Disclaimer: Template Placeholder, (above Provider Specifications)
Defining the new eligibility criteria, Needs-Based Criteria, for determining 24/7 Residential Habilitation eligibility for SLS potential enrollees.	Residential Services SCS: Page 2, Eligibility section. Page 7, Glossary Definition section



Category 4: To be Addressed in Another Venue

Parking Lot Item	Plan to Address
Carol Meredith cautioned about CDPHE requiring Residential Habilitation data collection that could become a barrier to the natural routine of the member.	Please refer to future efforts regarding the crossover of Long Term Home Health and HCBS. Please refer to the IRSS stakeholder workgroup - https://www.colorado.gov/pacific/hcpf/OCL-stakeholder-engagement
HCPF needs to simplify/clarify the numerous definitions of Personal Care in waivers/policies.	The Department continues to pursue waiver simplification and the associated alignment of waiver services and provider qualifications.
The following several parking lot issues come from PSS and Residential Habilitation comments at stakeholder meetings, <u>but</u> are serious questions hanging out in limbo to be addressed: What PSS and/or RH services can get "Extended State Plan Benefit" Status, which would increase the entire benefit (dental, OT, PT, Speech therapies, others)?	This was discussed at the June 18 th and August 26 th stakeholder meetings. The DD and SLS waivers currently have an extended Dental and Vision benefit in addition to the State Plan Dental and Vision benefits. The Department continues to pursue waiver simplification and the associated alignment of waiver services and provider qualifications, along with this work any extended State Plan benefits being explored would also be aligned. This was not included in Bolton's financial analysis and projections.
Add parking lot items to future agendas	Please refer to the Q&A Document available on the Department's website and this parking lot log response document.
Discussion on how stakeholders can work with HCPF to engage with state legislature about moving forward with the consolidated waiver	Please refer to the Budget staff PowerPoint from the March 22 nd , 2018 meeting, available on the Department's website, for information on the budget/legislative process.
Transition Services can follow the person not where they live	Please refer to CCR 8.553 "Life Skills Training, Home Delivered Meals, Peer Mentorship, Transition Set-up"
Home Care Agency licensures regarding Homemaker and the impact of imbedding the Homemaker service vs leaving Homemaker tasks as incidental to Personal Supports in the Personal Supports SCS	The Department continues to pursue waiver simplification and the associated alignment of waiver services and provider qualifications.



Does the parking lot live anywhere online	The Department will post the parking lot document, and once posted, will notify stakeholders via email.
Delineating each service within the cost model	Please see the Bolton final report
We need the final wording on the SCS for Residential Services, so people can access "g", "j" tube, enteric services.	As discussed in the June 18 th , 2019 stakeholder meeting, the existing DD statute specifies G tube services only as exempted from the Nurse Practice Act (NPA). The NPA and CNA Act are in sunset review summer/fall of 2019, through DORA, thus the Residential Service SCS includes only references to G tube in alignment with the current statute.
Adding self-advocacy, empowerment, etc. to the other 12 Service Coverage Standards (in addition Residential Services and Personal Supports).	The Department will consider adding this language where applicable and appropriate in the remaining SCSs.
Discuss Provider Qualifications for Residential Habilitation and Personal Supports & Services, and all other Service Coverage Standards	Please see the "Disclaimer Template" in the Residential Supports and Personal Supports Services Service and Coverage Standards. The Department will address these again at future stakeholder engagements.

Parking Lot Items by Meeting Date

Parking Lot Items from 8/26/2019

1. Request to address remaining SCSs with live edits – will be discussed at next co-chair meeting
2. Self-direction in all services
3. Wording changes that David, Bob, and others will send in

Additions from Gerrie:

1. Are spouses OK to get paid for providing services?
2. Adding self-advocacy, empowerment, etc. to all the other Service Coverage Standards

3. Defining the new eligibility criteria, Needs Based Criteria, for determining 24/7 Res Hab eligibility for SLS potential enrollees
4. Discuss Provider Qualifications for Res Hab and Personal Supports & Services and all other Service Coverage Standards

Parking Lot from 7-25-19

1. Request for Bolton actuarial study and request for review with stakeholder group before it is distributed (will be sent via email and posted on website)
2. Address parking lot issues – how and when
3. Adequate time to cover the scope of this work
4. Case studies – how will individuals be affected and how will families be involved?
5. How will this redesign affect things more globally – i.e. rates and caps, are we creating dependencies
6. Role of licensed nurses in Residential Habilitation
7. Individual's mental health (whole health, not just physical health) needs throughout the SCS
8. Carol Meredith cautioned about CDPHE requiring Residential Habilitation data collection that could become a barrier to the natural routine of the member.
9. HCPF needs to simplify/clarify the numerous definitions of Personal Care in waivers/policies.
10. Clarify the definition of Day Services between Residential Habilitation/Personal Supports and Community & Personal Engagement.

Additional Parking Lot Questions submitted by a stakeholder via email on 7-23-19

1. stakeholder meetings never completed pss whole review (provider specs; member directed personal supports). these need to be completed in real-time edits during a meeting.
2. hcpf has solicited emails from stakeholders on various issues. for waiver redesign transparency, all stakeholders need prompt access to issues in those emails.
3. right now hcpf rates are not due for re-consideration until "2017 plus 5 years." we need improvement/increases in rates for an effective waiver redesign, and a discussion of any options to accomplish this.
4. The following several parking lot issues come from pss and res hab comments at stakeholder meetings, but are serious questions hanging out in limbo to be addressed: d. what pss and/or rh services can get "extended state plan benefit" status, which would increase the entire benefit (dental, ot, pt, speech therapies, others)?

5. since we still have res hab to finish in real-time edits, may we get the two documents we got for pss, a “working” document and a “tracker” (all comments whether incorporated or not) document?
6. How can we change HCPFs decision to collect a year of CDASS usage data after the combined waiver is in effect, BEFORE adding the IHSS option as a benefit?
7. We never got an answer to whether, if a Core Service Budget Limit (eg: \$18,000) was used up, can the person tap into their Ancillary Services Budget Limit (eg: \$2700) and vice versa?
8. HCPF stated “no hard and fast rule” for a person’s needing a lot of Trach/Vent services in Res Hab. So what Service Coverage Standard wording can be added to cover that type of high need in Res Hab?
9. We need the final wording so people can access “g”, “j” tube, enteric services.
10. We need the final wording on Retainer Payments (for vacations, to ensure billing of time-duplicative services).

Parking Lot from 6-18-19

1. Additional stakeholder meetings moving forward
2. Release of Bolton report and a stakeholder meeting to discuss changes and edits with HCPF budget staff
3. Copying and pasting from PSS to res hab
4. CDASS as an agenda item for future meeting
5. How are we going to give feedback to Q&A
6. Stakeholder co-chairs making policy decisions during planning meetings
7. Add parking lot items to future agendas
8. Discussion on how stakeholders can work with HCPF to engage with state legislature about moving forward with the consolidated waiver

Parking Lot from 5-30-19

1. Rolling PSS into Residential Services – would this be cheaper? To ask Bolton on June 18th
2. Transition Services can follow the person not where they live
3. Respite care added to residential services
4. Sign-in sheet to include a “ok to contact” check box – John to check with legal



5. Case studies
6. Receiving presentations ahead of time and not spending meeting time going over presentations – specifically Bolton and HMA’s presentations for June 18th meeting
7. Home care agency licensures regarding Homemaker
8. Health services coordination service – discuss at future meeting
9. New definitions to be added to glossary
10. IRSS discussion – changing the rule on home modification, requests for funding will have to go through the Department of Housing. HCPF staff are going to have to make a change in the res hab document to reflect this.
11. Does the parking lot live anywhere online? John to make sure it is posted and notify everyone via email

Parking Lot from 5-15-19

1. Stakeholder contact information
2. Recruitment and retention of quality host home providers
3. Delineating each service within the cost model
4. Day Service limitations
5. New name for Day Services
6. Rates for Day Services
7. Rates for all services
8. Clarity on definitions and terms
9. Small group format for future meetings is difficult for webinar and phone participants
10. Mutually exclusive table for redesigned services
11. Access to questions the Department has already received – should be available on the website
12. Real time note-taking and real time editing in the next meeting
13. No changes to documents unless we all agree on them and can see what they are
14. Consumer Direction for all residential services
15. Written documentation of any decision the group makes



16. Question and answers done by May 30th

DRAFT