



INFORMATIONAL MEMO

TITLE:	STAKEHOLDER ENGAGEMENT OPPORTUNITIES ON DAY HABILITATION SERVICES
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	JUNE 22, 2022
DIVISION AND OFFICE:	BENEFITS & SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	HOME AND COMMUNITY-BASED SERVICES (HCBS) WAIVERS
KEY WORDS:	DAY HABILITATION, SPECIALIZED HABILITATION, SUPPORTED COMMUNITY CONNECTIONS, PROVIDERS, PASAS, RESIDENTIAL HABILITATION SERVICES & SUPPORTS, SH, SCC, RHSS, HOME AND COMMUNITYBASED SERVICES, HCBS
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APPROVED BY: CANDACE BAILEY	

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Purpose and Audience:

The purpose of this Informational Memo is to inform stakeholders of upcoming meetings hosted by the Department of Health Care Policy & Financing (Department) to discuss and receive feedback on the temporary implementation of Tier 3 Day Habilitation services, and how these individualized services should be implemented long-term, following the end of the Public Health Emergency (PHE). Additionally, the Department is also requesting stakeholder feedback related to Residential Habilitation Services and Supports (RHSS) and Supported Community Connections (SCC) services being provided by the same direct care provider.

These meetings are open to all interested stakeholders, including Home and Community-Based Services (HCBS) waiver members, guardians and relatives of members, advocates, and representatives of providers and Case Management Agencies

serving individuals who receive Day Habilitation services and RHSS through the HCBS Developmental Disabilities (DD) and Supportive Living Services (SLS) waivers.

Information:

The Department implemented temporary service provisions in HCBS in response to the COVID-19 PHE. One provision has allowed for Day Habilitation services to be delivered individually, using a more flexible, person-centered approach. This temporary provision was implemented through [Operational Memo 21-025](#). The Department understands the value that flexible service provision offers waiver members and we have received feedback that members like the temporary changes that have been made. The Department would like to make sure the changes made continue to be a positive one in members' lives. For this reason, the Department would like to check in with stakeholders about this change and assess whether these changes should continue with both Supported Community Connections and Specialized Habilitation. The Department is requesting feedback to determine our approach to permanently implementing this temporary allowance.

Additionally, on July 23, 2021, the Department issued [Operational Memo 21-054](#), which stated that a member's live-in paid direct care provider - Family Caregiver, group home provider, and host home provider - can no longer provide SCC services, beginning September 1, 2021. The purpose for issuing OM 21-054 was to ensure compliance with federal regulation that strictly prohibits the duplication of services and payments and return to the original benefit guidance. However, after receiving feedback expressing concern for this rollback, in the midst of the ongoing COVID-19 pandemic, in addition to the Direct Care Workforce shortage, the Department paused the rollback of the allowance for members to continue receiving both RHSS and SCC from the same direct care provider through [Operational Memo 21-062](#). This policy continues to remain in place under our emergency waiver authority until a future date determined by the Department.

At this time, the Department is requesting stakeholder feedback as to how the community integration requirement for these two services are similar or different from one another, how we can best distinguish the requirements for each service, in order to inform possible regulation updates to ensure there is no longer real, or perceived, duplication of services. For the time being, this policy will continue to remain in place and no changes to the policy will be made without feedback from stakeholders.

Request for Stakeholder Feedback

Prior to hosting the upcoming stakeholder meetings, the Department is requesting stakeholder feedback and suggestions related to these two topics. If you would like to

submit feedback on either or both topics, please complete the [Day Habilitation Services Stakeholder Survey](#) by Friday, August 5.

Stakeholder Engagement Opportunities

The Department seeks to engage providers, waiver members, family members, advocates, and Case Managers through a series of stakeholder meetings to work towards the potential long-term implementation of changes to Day Habilitation services in both the DD and SLS waivers.

Day Habilitation engagement opportunities are being divided into two groups:

- Individualized, Tier 3, Day Habilitation services stakeholders, and
- Residential Habilitation Services and Supports and SCC services provided by the same direct care provider stakeholders

Both groups will have two opportunities to provide comments, suggestions and asks questions, as well as review potential waiver application and regulation changes. The Department will host one full meeting to discuss each topic, as well as a final, combined meeting to discuss any follow up from the initial two meetings. Stakeholders interested in these topics are encouraged to hold the dates for the following engagement opportunities:

Initial Tier 3 Day Habilitation Stakeholder Meeting

Date and Time:

Thursday, September 1, 2022

11:00 a.m.– 12:30 p.m. MT

Initial RHSS & SCC – Direct Care Provider Stakeholder Meeting

Date and Time:

Thursday, September 29, 2022

11:00 a.m.– 12:30 p.m. MT

Follow-up of Both Topics Stakeholder Meeting

Date and Time:

Thursday, October 27, 2022

11:00 a.m.– 12:30 p.m. MT

All these Day Habilitation Stakeholder Meetings have the same access information:

[Webinar Link for all meetings](#)

Call-In Phone Number:

1-833-548-0276

Webinar ID: 822 0002 5736

Participant Code: 798289

Reasonable accommodations will be provided upon request for persons with disabilities. Auxiliary aids and services for individuals with disabilities and language services for individuals whose first language is not English may be provided upon request. Please notify John Barry at 303-866-3173 or John.R.Barry@state.co.us or the 504/ADA Coordinator at hcpf504ada@state.co.us at least one week prior to the meeting to make arrangements.

Attachment(s):

None

Department Contact:

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