



INFORMATIONAL MEMO

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Purpose and Audience:

The purpose of this Informational Memo is to inform stakeholders of updates related to the implementation of the following key priority projects within the Office of Community Living: Colorado Single Assessment and Person-Centered Support Plan (CSA and PCSP); Person-Centered Budget Algorithm (PCBA); Supports Intensity Scale (SIS) Decommissioning; and Community First Choice (CFC). This memo is not meant to provide operational or policy guidance.

Information:

The Department of Health Care Policy and Financing (HCPF) acknowledges the strain that has been placed on the Long-Term Services and Supports (LTSS) System over the past year. The Public Health Emergency Unwind placed significant pressure on county eligibility sites and Case Management Agencies. The transitioning of Case Management Agencies from 42 Private Case Management Agencies, Single Entry Points, and Community Centered Boards to 15 Case Management Agencies has been an enormous change. Finally, temporary issues with the new Care and Case Management (CCM) System have created additional workload for case managers and caused system disruption. HCPF continues to work diligently to resolve all ongoing issues facing members, providers, and Case Management Agencies that have resulted from these co-occurring initiatives.

HCPF has heard the requests to give the system time to stabilize before moving forward any new initiatives or programs. Our priority remains that members continue to have access to the services that they are eligible for, that providers are paid timely, and that case managers can be successful in their work. As we continue to work to stabilize the LTSS system we must take lessons learned from recent system launches and large programmatic changes into consideration for future changes. With that in mind, HCPF has been working over the last several months to pivot our approach on several key, priority projects to both ensure their successful rollout and give the system time and space to stabilize.

To both honor the feedback received from stakeholders, while balancing our commitments to the legislature and the long-term vision of evolving our system to be more person-centered, the goal is to focus on LTSS stabilization and the implementation of Community First Choice (CFC) on July 1, 2025. Other efforts, such as the Colorado Single Assessment (CSA), Person-Centered Support Plan (PCSP), and the Person-Centered Budget Algorithm (PCBA) are still critical to HCPF, but we intend to slow down the roll out to allow the system to adapt to the current and impending changes.

Proposal:

CFC is scheduled to launch on July 1, 2025. Implementing CFC on-time ensures that members have access to expanded services as soon as possible.

- In the launch of CFC, HCPF will leverage existing system functionality where appropriate. This includes continued use of the newly established Care and

Case Management (CCM) system functionalities and the existing Bridge Prior Authorization Request (PAR) processes.

- HCPF will submit a State Plan Amendment to the Centers for Medicare and Medicaid Services this fall to request approval of Colorado's 1915(k) authority and updates to the Colorado Code of Regulations will be brought to the Medical Services Board for review and approval over the winter.
- Training for case managers will be provided on how to enroll members in CFC in the spring of 2025.
- Beginning July 1, 2025, members who meet institutional level of care requirements and have an assessed need for long-term care, as identified in the ULTC 100.2, may be authorized services under CFC during their annual reassessment or when initially enrolling. Members may be authorized for HCBS waiver, CFC, and existing State Plan services simultaneously, as long as they are not duplicative.
 - Get involved in guiding the implementation of Community First Choice (CFC). [The CFC Council meets](#) monthly to discuss the implementation of CFC. This meeting is open to the public and HCPF encourages interested parties to participate.
- The existing Task Worksheets currently used by Consumer-Directed Attendant Support Services (CDASS) and In-Home Support Services (IHSS) will be modified to be used for all CFC Personal Care and Homemaker Services, including CDASS, IHSS, and Agency-based service delivery options. The Task Worksheets will also be utilized for children and youth.
 - **A workgroup is planned** to kick-off in late fall 2024 to discuss using the task worksheets. Information will be sent out via the [Office of Community Living Digest](#) and posted on the [OCL Stakeholder Engagement Calendar](#).
- The existing ULTC 100.2 will be used as the eligibility assessment for CFC and HCPF will delay the use of the Colorado Single Assessment and Person-Centered Support Plan (CSA and PCSP) for all waivers, except for the waivers supporting adult members with Intellectual and Developmental Disabilities (IDD).

- The [Person-Centered Budget Algorithm \(PCBA\)](#) will be delayed until after the CSA has been fully implemented for all waiver programs and sufficient data has been gathered to develop and evaluate the PCBA within the confines of CFC.
- An interim CSA support level strategy will be implemented for Residential and Day Habilitation Services for adult members with Intellectual and Developmental Disabilities (IDD) who are *newly* enrolling in the HCBS-Developmental Disabilities and Supported Living Services waivers.¹
 - **HCPF will collaborate with stakeholders** through the existing Assessment and Support Plan Stakeholder Working Session meetings in the coming months to work through the approach for the CSA transition plan, the interim CSA support level strategy, and the decommissioning of the SIS Assessment.

Other Related HCPF Initiatives:

- Two waivers, the Children with Life Limiting Illness waiver (CLLI) and the Children's Home & Community Based Services Waiver (CHCBS), will be merged into the new Children with Complex Health Needs Waiver (CwCHN). This waiver merger will increase access to needed services, like Respite.
 - **For more information** or to get involved in this initiative, visit the [Community First Choice website](#).
- The planned Skilled Nurse Assessor, [as approved through R-10](#), will be launched to complete a skilled care acuity assessment prior to the authorization of Long-Term Home Health (LTHH), Private Duty Nursing (PDN), and Health Maintenance Activities (HMA). The Nurse Assessor will also educate members about their skilled care service options at the time of the assessment to ensure members find a service that fits their need.
 - **Get involved** in guiding the implementation of the nurse assessor: HCPF will begin collecting feedback during existing meetings including the Children's Disability Advisory Committee (CDAC) on Wednesday, Oct. 9,

¹ This will be necessary when the Supports Intensity Scale assessment (SIS) is decommissioned June 30, 2025. HCPF will engage with stakeholders around this interim strategy in the coming months.

2024, and the Participant Directed Programs Policy Collaborative (PDPPC) on Wednesday, Oct. 23, 2024, and will have dedicated opportunities for engagement beginning early 2025.

- Current efforts to reinstate Pediatric Long-Term Home Health Prior Authorization Requests (PARs) will continue to move forward to ensure that authorized skilled services are medically necessary and that members receive services that are most aligned with their needs.
 - **Get involved** in guiding the reinstatement of Pediatric Long-Term Home Health PARs: Join the [PLTHH PAR Restart Workgroup](#).

Next Steps:

HCPF is committed to engaging stakeholders on these initiatives. We encourage stakeholders to participate in the initiative-specific opportunities highlighted above. HCPF will also host a stakeholder webinar to receive feedback on the roll-out plan outlined in this memo on **Thursday, Oct. 10, 2024, from 11 a.m. to 12 p.m.**

[Register in advance for this webinar](#)

After registering, you will receive a confirmation email containing information about joining the webinar and adding it to your calendar.

Announcements will continue to be made through the [OCL Digest](#) and [Stakeholder Engagement Calendar](#).

Background:

Community First Choice (CFC): Found in section 1915(k) of the Social Security Act, CFC allows Colorado to offer a set of Home and Community-Based Services (HCBS) on a statewide basis to eligible Health First Colorado (Colorado's Medicaid Program) members. [Through CFC](#), members will have the option to direct their own attendant care services or to receive services through a provider agency. HCPF received legislative approval in 2023 to implement CFC through [Senate Bill 23-289](#) and budget authority was granted the same year. CFC is a transformative program that will increase access to HCBS across the state with a focus on enhanced access to participant direction. In addition, the federal government will contribute additional funding for services paid through CFC. Currently the federal government pays about

50% of service costs for 1915(c) waivers, but once the services move under CFC their contribution will increase to 56%, which is estimated to save the state money.

Supports Intensity Scale (SIS): The SIS is a needs assessment which gathers information by means of a face-to-face interview with the person being assessed and other people who know them well. The people who answer interview questions are called respondents. The interview collects information about activities such as shopping, dressing, taking medicine and going to visit friends. The interview questions focus on what supports a person needs to do these activities. The SIS assessment was developed in 2004 by the American Association on Intellectual and Developmental Disabilities (AAIDD). It was tested across the country to ensure its validity and reliability. The Centers for Medicare and Medicaid Services (CMS), requires that a consistent method is used for everyone across the state to assess the need for services provided in the adult Medicaid Waivers for persons with Developmental Disabilities. HCPF has a rate-setting methodology that reimburses for services according to a person's needs as identified using the uniform SIS assessment. Persons are assigned a Support Level based on their intensity of support needs identified by the assessment. This SIS is planned to be decommissioned as directed in <https://leg.colorado.gov/bills/sb16-192>, in July 2025, and replaced with the new Colorado Single Assessment and an interim support level strategy until the development and implementation of the Person Centered Budget Algorithm.

Colorado Single Assessment and Person-Centered Support Plan: HCPF, in collaboration with stakeholders, has developed new processes for eligibility determinations, needs assessments, and support planning for all individuals seeking or receiving long-term services and supports (LTSS). The new processes will be person-centered, enhance self-direction, and facilitate greater coordination of services, as well as be equally applicable to adults and children with disabilities. Learn about the Colorado Single Assessment and Person Centered Support Plan at: <https://hcpf.colorado.gov/new-assessment-and-person-centered-support-plan>. The new process will be automated in a new case management IT solution. Learn more about the IT solution on HCPF's [Care and Case Management System web page](#).

Person-Centered Budget Algorithm: HCPF is working with Optumas to develop a Person-Centered Budget Algorithm (PCBA) for Health First Colorado Home and Community-Based Services (HCBS) waiver programs.

As part of the new assessment and person-centered support planning process, for all LTSS programs, the PCBA will help identify the right amount of support for members based on assessed need, and together with strengths and preferences identified

during the assessment, contribute to a person-centered support plan. The PCBA is an important component of the assessment and support planning process to ensure a consistent, objective and equitable method for assigning budgets for all members receiving HCBS.

Long-Term Home Health, Private Duty Nursing, and Health Maintenance Nurse

Assessor: HCPF identified an opportunity to streamline the way members are assessed and receive authorization for skilled care services by implementing a 3rd party skilled nurse assessor. By implementing this 3rd party skilled nurse assessor, HCPF will assess members for the appropriate level of skilled care services across the service modalities, thereby reducing duplicative service authorizations and potential conflicts of interest with the service providers. Additionally, the 3rd party skilled nurse assessor will be assessing the member for all skilled care needs and discussing with the member the service and delivery options that can best meet their needs including self-direction. To implement this solution, HCPF requested funds through a legislative budget request, R-10.

This request was approved and HCPF is taking steps towards implementation. HCPF anticipates posting a “Request for Proposal (RFP)” from vendors who are interested in conducting this work on behalf of HCPF in Fall 2024.

Pediatric Long-Term Home Health (LTHH) Prior Authorization Requests (PARs):

Federal regulations require state Medicaid agencies [HCPF] to include a “statewide surveillance and utilization review subsystem” to ensure services are medically necessary and to prevent, detect, and control fraud. HCPF meets this requirement by requiring services to be pre-approved through the Prior Authorization Request (PAR) process.

PARs for pediatric LTHH were temporarily paused during the pandemic; however, HCPF’s intention has always been, and is required to, include the resumption of pediatric PAR requirements. Turning on pediatric LTHH PARs will ensure that provided skilled care services are medically necessary and that members receive services that are most aligned with their needs.

HCPF anticipates resuming Pediatric LTHH PARs by service type (RN, CNA, PT, OT, ST) and in a phased in approach. We are working diligently with our stakeholder partners in identifying the approach for resuming PAR requirements for all pediatric LTHH services.

Stay Connected:

Additional updates and opportunities for input will be announced through the [Office of Community Living Digest](#) and posted on the [OCL Stakeholder Engagement Calendar](#).

Attachment(s):

None

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sis_sl@state.co.us, Supports Intensity Scale (SIS)