



OPERATIONAL MEMO

TITLE:	DAY HABILITATION SERVICES IN RESPONSE TO COVID-19
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	AUGUST 6, 2020
DIVISION AND OFFICE:	BENEFITS AND SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	HOME AND COMMUNITY-BASED SERVICES (HCBS) WAIVERS
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HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to inform Home and Community-Based Services (HCBS) Day Habilitation provider agencies and Case Management Agencies (CMAs) of additional temporary changes approved by the Department of Health Care Policy & Financing (Department) in response to the COVID-19 pandemic.

Information:

The Department is issuing guidance in response to the impact that COVID-19 has had on how Day Habilitation services are provided. This guidance provides clarity about how Day Habilitation, which includes Specialized Habilitation (SH) and Supported Community Connections (SCC), may be provided to HCBS waiver members under the [Protect Our Neighbors](#) Executive Order.

Day Habilitation Services and Supports within the Supported Living Services (SLS) and waiver for persons with Developmental Disabilities (DD) encompass three options:

1. Specialized Habilitation (SH) services
2. Supported Community Connections (SCC)
3. Prevocational services.

The Department issued Operational Memo 20-070: Updated Information Pertaining to Day Program Services in Response to COVID-19¹ detailing how Day Programs may render services. This memo does not supersede OM 20-070, but rather provides additional day habilitation guidance.

Specialized Habilitation

Specialized Habilitation (SH) services are provided to support the member to maintain or increase their level of self-sufficiency. Until further notice, modified SH services may include virtual individual and/or group activities, hosted by the current SH service agency. For those members who are considered “at risk of severe illness from COVID-19,”² or do not feel comfortable returning to group settings, SH may also continue to be provided one-on-one, in the member’s home by the SH service agency.

Supported Community Connections

Supported Community Connections (SCC) services are provided to support the maintenance or development of the skills necessary to enable the member to access typical activities and functions of community life. Until further notice, SCC does not have to “**utilize the community as a learning environment**” to be billed under SCC. The Department acknowledges the difficulties service providers have in meeting this requirement with businesses temporarily closed or having modified their business structure. Because of this, the Department is temporarily modifying requirements for SCC services. **Modifications are bolded:**

- Provide a wide variety of opportunities to facilitate and build relationships and natural supports in the community while **accessing** the community as a learning environment to provide services and supports as identified in the member’s service plan.
- Are conducted in a variety of settings, in which the member interacts with persons without disabilities other than those individuals who are providing services to the member. These types of services may include socialization,

¹ Find OM 20-070 and other relevant memos on the Department’s Memo Series page, under “Operational Memos”: <https://www.colorado.gov/hcpf/2020-memo-series-communications>.

² “Individuals at risk of severe illness from COVID-19” is defined in Executive Order D 2020 127 https://drive.google.com/file/d/1WQi5_Cgcjqe8W1nJsOqoHoshtAXMjRV1/view.

adaptive skills and personnel to accompany and support the client in community settings, **including virtual community settings.**

- Provide resources necessary for participation in activities and supplies related to skill acquisition, retention or improvement and are provided by the service agency as part of the established reimbursement rate. **A laptop would be an example of a resource that a SCC service agency might provide to the member during the service for the member to virtually access the community.**
- May be provided in a group (**only out in the community**) or may be provided to a single member (**this can temporarily be in-home for members in an IRSS setting only**) in a learning environment to provide instruction when identified in the service plan.
- Activities provided exclusively for recreational purposes are not a benefit and shall not be reimbursed.

The Department encourages service delivery in the community whenever possible as the risk of transmission of the COVID-19 illness is lower outdoors.

Prevocational Services

- Prevocational services are currently not being modified, and therefore is not included in this memo.

Role of Residential Providers

Supported Community Connections (SCC)

Additionally, the Department is temporarily allowing HCBS members who reside in an Individual Residential Services and Supports (IRSS) setting or Group Homes to determine if he/she feels comfortable returning to his/her SCC service agency or would prefer the IRSS or Group Residential Services Supports (GRSS) Provider to temporarily provide the SCC service to the member due to health and safety reasons. This may only occur if the residential provider is also approved to provide supported community connections.

Temporarily allowing the residential provider to provide the SCC service to a member who resides in the home should only be utilized when the member cannot benefit from receiving the service virtually, through the current SCC service agency, and needs to receive the service in-person. These changes are intended to allow members previously receiving SCC to continue to receive the critical services on the service plan without risking exposure to outside individuals, including SCC service agency staff.

- **The decision to allow the residential provider to temporarily provide SCC in place of the SCC service agency is to be made solely by the HCBS waiver member or guardian**, and not the residential provider or the Case Manager.
- If a residential provider is willing to temporarily provide SCC, **the PASA must already be an enrolled SCC provider**. If the PASA is not an enrolled SCC provider, then the member may not receive SCC services through the residential provider and should instead receive these services virtually or one-on-one in the home through the current SCC provider.
- If the member chooses to have his/her residential provider provide the SCC service, it **must be documented in the service plan**.
- To temporarily provide SCC to a member who resides in the home and bill for the service, the residential provider must provide the service out in the community, apart from the residence. **SCC cannot be provided by the residential provider using virtual means to access the community**.
- **Non-medical transportation (NMT) reimbursement will not be available** for residential providers who temporarily provide SCC services, even when transporting the member to various activities.
- Finally, if a member does not feel comfortable receiving SCC in the home through the SCC service agency, and the member also does not want to receive the SCC service out in the community through his/her residential provider, **the member should work with his/her case manager to ensure all needs are being met**.

Specialized Habilitation (SH)

Under current rule and waiver, residential providers are expected to provide 24/7 regular care for members including services that are provided under SH, such as assistance with feeding, toileting, self-care, etc. Because of this, residential providers will not be allowed to also provide the SH service to members who live in the home, but do not feel comfortable risking exposure to outside individuals.

For other information about COVID-19, follow the [CDC website](#) to keep up with the general trends and what's happening. Communicating with your [state health department](#) and watching local news will help you with specifics.

Attachment(s):

None

Department Contact:

HCPF_HCBS_Questions@state.co.us

Department COVID-19 Webpage:

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information about COVID-19, please call the CDPHE Call Center at 303-692-2700. For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email COHELP@RMPDC.org, for answers in English and Spanish (Español), Mandarin (普通话), and more.