



OPERATIONAL MEMO

TITLE:	UPDATED: CLARIFICATION ON RESIDENTIAL HABILITATION SERVICES AND SUPPORTS, SUPPORTED COMMUNITY CONNECTIONS, AND COMMUNITY CONNECTOR
SUPERSEDES NUMBER:	HCPF OM 21-050
EFFECTIVE DATE:	SEPTEMBER 1, 2021
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 **revised** Operational Memo is to provide updated guidance on temporary changes to Supported Community Connections (SCC) and Community Connector (CC) services previously approved by the Department of Health Care Policy & Financing (Department) and **extend the time period to come into compliance**. Additionally, this memo provides clarification to Home and Community-Based Services (HCBS) Residential Habilitation Services and Supports (RHSS), SCC, and Non-Medical Transportation (NMT) provider agencies and Case Management Agencies (CMAs) related to billing and service delivery.

Information:

The Department issued guidance in three separate memos (OM 20-024, superseded by OM 20-046, and OM 20-060) providing information on the temporary changes allowed for some HCBS benefits in response to the COVID-19 pandemic. These temporary changes were made to CC services within the Children's Extensive Support (CES) and Children's Habilitation Residential Program (CHRP) waivers (which previously referred to CC as SCC) and SCC within the Supported Living Services (SLS) waiver. With the availability of vaccinations, and the reopening of community businesses and activities, the Department is issuing updated guidance specific to Operational Memo 21-050 (all Department memos can be found at <https://hcpf.colorado.gov/memo-series>).

What Has Changed

Due to the availability of vaccinations for all adults across the state of Colorado, the flexibility for SCC to temporarily be allowed to be provided by the member's legally responsible person, which for an adult includes the legal guardian or spouse, is no longer effective **September 1, 2021**.

What Has Not Changed

The temporary allowance for legally responsible persons, which for children means the parent or legal guardian, to provide the CC service is *still allowed and does not currently have an end date*, as it is subject to the end of the Public Health Emergency and the ability for children under the age of 12 to be vaccinated. An Operational Memo will be posted on the [2021 Memo Series Communication webpage](#) once that temporary allowance is no longer necessary. Services provided by a legally responsible person must continue to remain at the amount authorized during the 2020 service plan year, as stated in Operational Memo 20-060 (which was superseded by OM 21-050 and now by this memo. All Department memos can be found at <https://hcpf.colorado.gov/memo-series>).

Additionally, both SCC and CC services can continue to be provided via telehealth if the member does not feel comfortable returning to in-person services. Telehealth CC services cannot be provided by the legally responsible person.

Additional Clarification for RHSS, SCC, & NMT services:Residential Habilitation Services and Supports (RHSS)

RHSS within the DD waiver can be provided by a variety of live-in paid direct care providers - Family Caregivers, group home providers, and host home providers.

Because these individuals reside in the home with the member and are the paid direct care provider for residential services, they cannot also provide SCC services to that member. When the same direct care provider provides both RHSS and SCC to the member residing in their home, those services are duplicative of one another and SCC cannot be differentiated from the per diem residential services.

Specifically, [10 CCR 2505-10 8.500.5.B.7.d.vii.](#) states that "the following RHSS activities assist Clients to reside as independently as possible in the community; Community access services that explore community services available to all people, natural supports available to the Client and develop methods to access additional services, supports and activities needed by the Client." This is duplicative of SCC services which "enable the client to access typical activities and functions of community life, such as those chosen by the general populations" in addition to "providing a wide variety of opportunities to facilitate and build relationships and natural supports in the community while utilizing the community as a learning environment" ([10 CCR 2505-10 8.500.5.B.2.d.](#)).

The residential direct care provider is paid a per diem for 24/7 services; this individual cannot switch back and forth between providing residential services and SCC.

Supported Community Connections

While a member's RHSS direct care provider cannot be the same person as the member's SCC provider, another member of the household, or relative is permitted to provide SCC, as long as they are not the paid RHSS provider. The RHSS provider can be paid to transport the member to and from Day Habilitation. From there, it is up to the SCC provider to decide whether to bill for SCC services for the entirety of the service, or alternate between billing between NMT and SCC, as outlined in Informational Memo 20-014 (can be found on the 2020 Memo Series page at <https://hcpf.colorado.gov/2020-memo-series-communications>), as there can be no overlapping timeframe where both NMT and SCC are billed.

Non-Medical Transportation (NMT)

NMT enables members to gain access to Day Habilitation services, referenced in regulations as day program, which encompasses both Specialized Habilitation and SCC, and can be billed to transport members "to and from day program and shall be reimbursed based on the applicable mileage band" as stated in [10 CCR 2505-10 8.500.5.B.5.b.](#) RHSS direct care providers may render and bill for transporting members to and from Day Habilitation services, per the Support Plan. This should be in alignment with the agencies' operations and billing procedures.

Attachment(s):

None

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