



OPERATIONAL MEMO

TITLE:	UPDATE PERTAINING TO THE PROVISION OF RESIDENTIAL HABILITATION SERVICES AND SUPPORTS AND SUPPORTED COMMUNITY CONNECTIONS
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	AUGUST 12, 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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OPERATIONAL MEMO NUMBER: HCPF OM 21-062	
ISSUE DATE: AUGUST 12, 2021	
APPROVED BY: COLIN LAUGHLIN	

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Purpose and Audience:

The purpose of this Operational Memo is to provide stakeholders an update pertaining to [Operational Memo 21-054](#) in which the Department of Health Care Policy & Financing (Department) stated that beginning September 1, 2021, a member's Residential Habilitation Services and Supports (RHSS) direct care provider cannot also provide Supported Community Connections (SCC).

Information:

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 Supported Community Connections, 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.

In response, stakeholders informed the Department that this change during an increase in cases involving the COVID Delta variant was very concerning. Further, Direct Care Workforce shortages created additional apprehension about this operational guidance.

The Department recognizes that the state is facing a renewed surge in the Delta variant and a workforce crisis. Accordingly, to ensure necessary services continue to be provided during this phase of the crisis, the Department is ***pausing the rollback of this allowance*** to allow members to continue receiving both RHSS and SCC from the same direct care provider. This policy will remain in place under our emergency waiver authority until a future date determined by the Department. We commit to giving members, families, and providers ample time to comply with this change in the future.

To work towards a solution that will remain within federal requirements and to ensure that members have a choice in their providers, the Department is gathering data on the impact of the clarification through research and engaging the stakeholder community. Specifically, the Department is reviewing service definitions, as there are similar components in both RHSS and Day Habilitation services that includes both Specialized Habilitation and SCC. Once the Department has conducted the necessary research and evaluated data, the Department will convene a stakeholder meeting to gather input, suggestions and feedback on proposed revisions.

Attachment(s):

None

Department Contact:

hcpf_hcbs_questions@state.co.us