



## OPERATIONAL MEMO

---

<b>Title:</b> Physical Security Improvements for County Departments of Human/Social Services	<b>Topic:</b> County Cybersecurity Compliance
<b>Audience:</b> County Departments of Human/Social Services	<b>Sub-Topic:</b> Physical Security
<b>Supersedes Number:</b> N/A	<b>Division:</b> County Relations & Administration
<b>Effective Date:</b> June 8, 2023	<b>Office:</b> Policy, Communication & Administration
<b>Expiration Date:</b> June 8, 2025	<b>Program Area:</b> County Relations
<b>Key Words:</b> Physical Security, County Human Services, Information Security, ARPA, Assessments, Public Safety	
<b>Legal Authority:</b> CISP-011 IT Environmental Protection & Physical Security; 10 CCR 2505-5 1.020.4.4	
<b>Memo Author:</b> Mahsa Rahimian	
<b>Operational Memo Number:</b> HCPF OM 23-039	
<b>Issue Date:</b> June 8, 2023	
<b>Approved By:</b> Rachel Reiter	

---

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 provide information and resources to county departments of human/social services (counties) regarding an opportunity from the Department of Health Care Policy and Financing (HCPF) to enhance services for HCBS population through improved county office physical and environmental security, as well as to provide a guidance on the process to access funding for these purposes through the American Rescue Plan Act (ARPA).

### **Background:**

In this project, our goal is to collaborate with any Colorado county that chooses to participate. We aim to identify and mitigate the most likely and highest impact physical

security threats while assisting counties in enhancing their physical and environmental security measures.

The main purpose of this project is to enhance technology security measures for the County Departments of Human Services and Single-Entry Points. These departments are responsible for making eligibility determinations for individuals applying for and receiving Medicaid, Medicaid LTSS (Long-Term Services and Supports) including HCBS (Home and Community-Based Services), state-funded HCBS, and other public assistance benefits.

The Department is using CISP-011: [IT Environmental Protection & Physical Security](#) as a basis to identify- and remediate physical security threats. In order to address physical security needs, the Department is providing a one-time funding opportunity to county departments to improve safeguards to client data, hardware, and staff. Any projects funded by this grant must supplement, not supplant existing funding streams dedicated to physical security.

### **Information:**

The scope of this project will include:

1. 10-15 onsite visits to county departments
2. Grant application and determination process
3. Grant monitoring and reporting process
4. All grants must complete final spending of funds by Sept. 30, 2024 and final invoices must be submitted no later than Oct. 15, 2024.

### Onsite Visits

Colorado Department of Public Safety (CDPS) and the Department are working together to collect information from 10 to 15 on-site assessments of volunteer pilot sites in April and May 2023. The volunteers were reviewed for physical security concerns and received verbal options to consider for physical security solutions. These pilot sites were comprised of volunteers who served as valuable learning opportunities for us to gather information regarding the physical security concerns that counties may have.

The Department made note of and will share these options to consider to county departments broadly in June 2023. Counties who do not receive an onsite assessment are encouraged to review the written information from HCPF and discuss security

concerns with staff, keeping in mind past and current security concerns to determine options to address those concerns.

### Grant Process

This grant opportunity to enhance physical security is funded through Home and Community Based Services (HCBS) American Rescue Plan Act (ARPA) and supplemented with HCPF County Grant Program funds. ARPA funds will only cover 100% of purchases including keypad/key card entry systems, door closers, and security camera systems. Counties may request funding for other physical security needs as identified in onsite visits which may be partially funded at 40% by the County Grant Program. The Department will review requests and note which line items and amounts are approved for this funding through the Notice of Determination. Under these grant funds, there are specific items that are not allowable. These include:

1. Fringe Costs: The grant does not cover the expenses related to the salaries, benefits, or fringe costs of employees who are involved in installing equipment or overseeing the contract.
2. Travel: Costs associated with travel, such as transportation, accommodation, meals, and incidental expenses, are not eligible for funding through the Security Grant.
3. Supplies: The grant does not cover the costs of purchasing supplies, including equipment not related to physical security, materials, or consumables required for the project.
5. Leased Space: Expenses related to leasing or renting space for the project, such as office or storage space, are not allowable under the Security Grant.
6. Indirect Charges: The grant does not cover indirect charges, such as administrative overhead, general operating expenses, or indirect costs associated with the project.

It is important to review the specific guidelines and restrictions of the Security Grant program to ensure compliance and eligibility for funding.

The targeted grants will be open to counties in June and are a first-come first-served disbursement process. ARPA funds must be spent by September 2024. County Grant funds must be spent by June 30, 2024. The targeted grants process is described in the following steps:

1. Counties decide which physical security solutions they need for their offices
2. Counties submit an "Intent to Apply" letter on county department letterhead to Department between **June 15 - July 15, 2023** and detail their needs.

- The “Intent to Apply” must be submitted to the [County Relations webform](#), ticket type “Grant Program”
- This intent to apply should include the following FIVE items:
  1. County point of contact
  2. Itemized budget

<i>Provide a budget in the following table and expand as needed.</i>			
ITEM BRIEF DESCRIPTION	RATE AND UNIT OF MEASURE	QUANTITY	TOTAL FOR PROJECT
<i>EXAMPLE</i> AA Software	\$400.00 per license	2 licenses	\$800.00
PROJECT BUDGET TOTAL			

3. Project Work Plan - July 1, 2023 - June/September 30, 2024

MAJOR TASK OR ACTIVITY	TASK/ACTIVITY/START/COMPLETION DATES	RESPONSIBLE INDIVIDUAL	DELIVERABLE
EXAMPLE  Develop customer service messaging for Call Center agents regarding the new business process	Start Date: 12/20/2022  Messaging due: 1/5/2023  Process approval due: 1/20/2023  Completion Date:	Call Center review: Alex M./Call Center  Messaging: Tracy R./Communications  Process Approval:	Process approval via email: John B.  Messaging blurb, no more than two paragraphs: Tracy R.

	1/31/2023	John B./Director	
--	-----------	------------------	--

- 4. Quote from vendor
- 5. Outline of new policy/procedure for each equipment purchase
  - o *The Department will try to provide resources on available physical security vendors, though counties can choose who they use to accomplish their projects*
- 3. The Department provides a Notice of Determination that opens access to physical security funds
  - o *The Notice of Determination may also include Conditions of Funding that must be carried out for the project funding to be opened.*
- 4. Counties begin purchasing physical security solutions and charge the Department through County Financial Management System (CFMS)
  - o *Instructions on how to code physical security projects to CFMS will be shared in each Notice of Determination*
  - o *Counties must provide receipts for all purchases to the Department*
- 5. Funding is first-come first-served until expended. Proposals will be reviewed and merited if they support deterring and detecting unauthorized access to secured areas, particularly staff-only areas with member records, servers and areas that support essential eligibility and HCBS business functions.

If additional funds are available, HCPF may open a second application period. Counties will be notified through the Department’s memo series.

Monitoring process

In order to ensure that this project is effective for all counties, the Department will monitor monthly reports from Settlement Accounting. Accordingly, the Department will reach out to county departments who have not yet spent funds in order to assist any roadblocks that they may experience to access or spend their funds. If a county department decides to forego their project, they should notify the Department as soon as possible, and the funds will be redistributed to other counties.

If a county department does not expend their funds and does not notify the Department or respond to several attempts made by the Department through both email and phone to contact them regarding their physical security grant funding, the Department may notice the county of intent to redistribute their funds to other counties. The Department will provide a date by which the county department should

respond in order to retain their grant funds, otherwise the funds will be redistributed to other counties.

**Action To Be Taken:**

Apply for Physical Security grant funds from June 15 - July 15.

**Definition(s):**

None

**Attachment(s):**

None

**HCPF Contact:**

[HCPF\\_CountyRelations@state.co.us](mailto:HCPF_CountyRelations@state.co.us)