



OPERATIONAL MEMO

Title: Residential Habilitation Services and Supports and Supported Community Connections Services Provided by Same Direct Care Worker	Topic: HCBS-DD
Audience: Home and Community-Based Services (HCBS) Provider Agencies, Case Management Agencies, Members, and Stakeholders	Sub-Topic: Provider Guidance
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Purpose and Audience:

The purpose of this Operational Memo is to provide updated guidance on a temporary allowance regarding Home and Community-Based Services (HCBS) Residential Habilitation Services and Supports (RHSS) and Supported Community Connections (SCC) services provided by the same Direct Care Worker (DCW).

Information:

Residential Habilitation Services and Supports (RHSS) within the Developmental Disabilities (DD) waiver can be provided by a variety of live-in paid direct care workers - Family Caregivers, group home providers, and host home providers. The

Department of Health Care Policy & Financing (HCPF) made a temporary allowance through the Appendix K waiver, as a result of the Public Health Emergency, to allow the same DCW to provide both RHSS and SCC services to the same HCBS waiver member. Currently, Appendix K waiver allowances are set to expire on Nov. 11, 2023, unless otherwise extended.

At this time, HCPF plans to continue this allowance **beyond Nov. 11, 2023**. This means a RHSS DCW can continue to provide SCC services to HCBS members who reside in their home.

With this continued allowance, the following requirements outlined in the Operational Memo 20-083 remain:

- **The decision for the RHSS provider to provide SCC is to be made solely by the HCBS waiver member or guardian, and not the RHSS provider or the Case Manager.**
- **If a RHSS provider is willing to provide SCC, the provider agency must already be an enrolled SCC provider.** If the provider agency is not an enrolled SCC provider, then the member may not receive SCC services through the RHSS provider and should instead receive these services through a different, enrolled SCC provider.
- **If the member chooses to have their RHSS provider provide SCC services, it must be documented in the Person-Centered Support Plan.**
- **To provide SCC to a member who resides in the home and bill for the service, the RHSS provider must provide the service out in the community, apart from the residence. SCC cannot be provided by the RHSS provider using virtual/telehealth means to access the community.**

Action To Be Taken:

Supported Community Connections

Day Habilitation service providers, which includes SCC providers, must ensure that SCC services meet all regulations found in (8.500.5.B.3.) with the addition of the following:

Provider agencies must maintain documentation that includes the date and start/end times of activities completed, what activities were completed, and

what Person-Centered Support Plan goals of the member are being achieved through the activity/ies.

SCC providers are to decide whether to bill for SCC services for the entirety of the service, or alternate between billing between Non-Medical Transportation (NMT) and SCC, as outlined in [Informational Memo 20-014](#), as there can be no overlapping timeframe where both NMT and SCC are billed.

Non-Medical Transportation

Agencies seeking reimbursement for Non-Medical Transportation (NMT) must be enrolled to provide this service. All drivers being reimbursed on behalf of the provider agency for transportation provided during SCC must meet all driver and vehicle requirements set forth in the regulations (8.494.40).

Documentation

DCWs providing both services must ensure that both RHSS and SCC activities are accurately documented to demonstrate both the community activities the member participates in under RHSS and those activities that are participated in under SCC. This documentation should be made available at the request of HCPF, the service provider agency, the case manager or the Colorado Department of Public Health and Environment.

All required credentialing documents verifying driver eligibility will remain on file at the provider agency, to be made available at the request of HCPF.

Next Steps

Currently, this continued allowance does not have an end date. HCPF will continue to conduct the necessary research and evaluate data, to then reconvene with stakeholders about the future of RHSS and SCC service provision.

Attachment(s):

None

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