



OPERATIONAL MEMO

Title: Home and Community-Based Services (HCBS) Base Wage and Rate Increase and Compliance Process 2025	Topic: HCBS Provider Reporting Compliance
Audience: HCBS Waiver Providers	Sub Topic: N/A
Supersedes Number: N/A	Division: Benefits and Services Management Division
Effective Date: July 1, 2025	Office: Office of Community Living
Expiration Date: June 30, 2026	Program Area: N/A
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Legal Authority: 10 C.C.R. 2505-10 Section 8.7418	
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Issue Date: July 1, 2025	
Approved By: Colin Laughlin	

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 make available to service providers the required 2025 Base Wage Attestation Form, timeframe, and process for the direct care worker base wage reporting for Home and Community-Based Services (HCBS) waiver services.

Information:

All impacted Direct Care Workers (DCWs), employees or independent contractors, are required to be paid at a minimum the \$17.00 per hour base wage outside of Denver or \$18.81 within Denver in alignment with the Denver minimum wage increase. This minimum base wage requirement applies to all hours worked, including time spent in work-related travel, training, and meetings. The minimum base wage is applicable to

each service listed below. No wage should be less than the minimum base wage nor averaged, if a DCW performs more than one service.

The services impacted by this requirement include:

- Adult Day Services
- Alternative Care Facility (ACF)
- Community Connector
- Consumer-Directed Attendant Support Services (CDASS)
- Foster Care Home
- Group Home
- Group Residential Support Services (GRSS)
- Homemaker
- Homemaker Enhanced
- Host Home (participants aged 18-20)
- Individual Residential Support Services (IRSS)
- In-Home Support Services (IHSS)
- Job Coaching
- Job Development
- Mentorship
- Personal Care
- Prevocational Services
- Respite
- Specialized Habilitation
- Supported Community Connections
- Supported Living Program

Providers subject to this requirement are required to complete the 2025 Workforce Report and 2025 Base Wage Attestation Form no later than Aug. 31, 2025. A link to the 2025 Workforce Report and instructions for submission will be emailed to the email address on file in the Provider Web Portal on July 1, 2025. CDASS Authorized Representatives and Employers of Record are exempt from attestation requirements.

For non-compliant providers, the suspension of claim payments may be imposed as early as Sept. 15, 2025. Once attestation form submission compliance is achieved, suspended payments will be released.

HCBS service providers who do not meet reporting or base wage requirements are subject to audit, corrective action, suspension of claims, and/or recoupment. Please note that audits initiated by HCPF are a separate process from the Wage Attestation Form submissions and require the submission of additional supporting documentation to confirm all compliance requirements are met by providers.

Action To Be Taken:

Providers must complete the required process by Aug. 31, 2025.

Definition(s):

Direct Care Workers are defined as non-administrative employees employed by and independent contractors contracted with a Provider Agency or Consumer-Directed Attendant Support Services (CDASS) employer who provides hands-on care, services, and support to older adults and individuals with disabilities across the long-term services and supports continuum within home and community-based settings.

Attachment(s):

For more information about this requirement, including the Frequently Asked Questions and reporting guidance, visit the Direct Care Workforce Base Wage page at <https://hcpf.colorado.gov/direct-care-workforce-base-wage>.

HCPF Contact:

If needed, please contact:

HCPF_BaseWage@state.co.us for questions about the attestation process or reporting requirements.