

## **OPERATIONAL MEMO**

<b>Title:</b> Resuming Requirements for In- Person Case Management	Topic: Case Management
Audience: Case Management Agencies (CMAs)	Sub-Topic: Choose an item.
Supersedes Number: OM 24-008	<b>Division:</b> Case Management Quality Performance
Effective Date: Jan. 1, 2026	Office: Office of Community Living
Expiration Date: Jan. 1, 2028	Program Area: Case Management
Key Words: Case Management Agency, CMA, Case Management, CM, Home and Community-Based Services, HCBS, Level of Care Screen, LOC Screen	
Legal Authority: Case Management Agency Contract, 8.7202.F	
Memo Author: Rhyann Lubitz	
Operational Memo Number: OM 25-062	
Issue Date: Oct. 14, 2025	
Approved By: Bonnie Silva	

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 notify Case Management Agencies (CMAs) of the reinstatement of the requirement to perform the Level of Care (LOC) Screen in-person.

### Information:

In March 2024, the Department of Health Care Policy and Financing (HCPF) implemented a temporary change to the in-person requirements for assessing a Member's functional eligibility. This change was implemented to ease administrative burden while the Long-Term Services and Supports (LTSS) system dealt with impacts of simultaneous challenges, including:

- Increased workload due to the end of the Public Health Emergency (PHE) combined with a record number of Medicaid and Supplemental Nutrition Assistance Program (SNAP) renewals;
- Issues with the implementation of IT system changes that resulted in additional workload and frustration for case managers; and
- Unanticipated complications with the transition of members to new case management agencies (CMAs) to achieve conflict-free case management.

Due to the overlap of converging initiatives and the challenges they presented, there were significant capacity issues within the CMAs. These capacity concerns resulted in backlogs in the enrollment of new LTSS Members. To support Members and CMAs, HCPF allowed for virtual and telephone LOC Screens to be completed while CMAs addressed their backlog. HCPF is reinstating the requirement of in-person assessments as CMAs have addressed the backlog of case management activities, conflict-free case management transitions are complete, and HCPF has implemented changes to stabilize the IT system.

#### **Action To Be Taken:**

CMAs are to conduct the LOC Screen in-person with Members as outlined in CMA contracts and case management regulations no later than January 1, 2026. As a reminder, exceptions to the in-person assessment requirement are extremely limited. Exceptions are only allowed in the case of major events, such as a natural disaster or pandemic, and must be approved in advance by the Department.

#### **Attachments:**

None

## **HCPF Contact:**

hcpf\_hcbs\_casemanagement@state.co.us