



POLICY MEMO

Title: Upcoming Licensure Requirement for Personal Care Service Providers Under Community First Choice	Topic: HCBS
Audience: Home and Community-Based Services (HCBS), SLS Waiver Personal Care Providers, SLS Waiver Members, Case Management Agencies (CMAs)	Sub-Topic: Provider Guidance
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Purpose and Audience:

The purpose of this Policy Memo is to inform Home and Community-Based Services (HCBS) Supported Living Services (SLS) Waiver Personal Care Providers, HCBS Case Management Agencies (CMAs), members, and families about the extended parameters for providers that are eligible for the Class A *or* Class B Home Care Agency licensure grants. Class A or Class B Home Care Agency licensure will be **required** to provide Personal Care services when Community First Choice (CFC) is implemented on July 1, 2025. Providers without a license will not be permitted to provide, or be reimbursed for, Personal Care services on or after this date. This memo supersedes PM 24-003 to provide an extension for the Application submission date and a revision to the criteria to have the Initial Licensure fee waived.

Information:

Community First Choice (CFC), found in section 1915(k) of the Social Security Act, allows Colorado to offer a set of HCBS on a statewide basis to eligible Health First Colorado (Colorado's Medicaid Program) members. Colorado intends to implement CFC on July 1, 2025. For additional information on CFC, please visit the [CFC webpage](#).

Implementation of CFC in Colorado requires the alignment of service definitions, provider qualifications, and licensing for all Personal Care providers. Personal Care provider licensing and certification requirements currently differ across HCBS waivers. The Department of Health Care Policy and Financing (HCPF) is building provider credentialing for CFC on the current licensing and credentialing structures whenever possible, but some adjustments are needed based on current, differing licensing requirements for Personal Care in CFC. This approach ensures consistent oversight of all Personal Care providers and members receiving Personal Care under CFC, while streamlining provider enrollment requirements for these providers.

While Personal Care will require a license, Homemaker will not require a license. Under CFC, Homemaker providers that do not have a Class A or Class B license will enroll in the 652 specialty code, which does not require a license for enrollment.

Below are two tables that outline current and future Personal Care provider requirements.

Personal Care Licensing requirements through June 30, 2025		
Waiver Name	Personal Care Licensure Requirement	Personal Care Provider Specialty Code
Brain Injury Waiver (BI)	Home Care Agency (HCA) License (Class A or B)	666
Community Mental Health Supports Waiver (CMHS)	HCA License (Class A or B)	666
Complementary and Integrative Health Waiver (CIH)	HCA License (Class A or B)	666
Elderly, Blind, and Disabled Waiver (EBD)	HCA License (Class A or B)	666
Supported Living Services Waiver (SLS)	Class A or B if hands-on care provided and/or 2+ employees OR Provider Signed Attestation	664

Personal Care Licensing requirements after July 1, 2025		
Program Name	Personal Care Licensure Requirement	Personal Care Provider Specialty Code
Community First Choice (CFC) <i>*Personal Care services will be moved out of the waivers and into CFC. At this time, the 664 specialty code will no longer be available*</i>	HCA License (Class A or B)	666

To ensure service continuity and access to care for members once CFC goes live, HCPF recommends SLS Waiver Personal Care Providers apply for a Class A or a Class B license as soon as possible. Under CFC, either license will be accepted, but HCPF and the Colorado Department of Public Health and Environment (CDPHE) strongly recommend applying for a Class B license. Some of the main differences between the two licensure options can be found in the table below:

Comparison chart of certain characteristics of Class A and a Class B licenses		
	Class A	Class B - <i>Department Recommendation</i>
Services available to provide	A home care agency that provides any skilled healthcare service. Agencies with a Class A license may also provide personal care services.	A home care agency that provides only personal care services. An agency with a Class B license shall not provide any skilled healthcare service.
Administration	Must have an HCA Administrator that is a licensed physician, registered nurse, or other licensed healthcare professional, or have experience and education in health service administration.	Must have an HCA Manager that has a high school diploma or GED, and at least one year documented supervisory experience in the provision of personal care services.
Initial cost for unlicensed SLS Waiver Personal Care providers	\$0	\$0

Initial cost for unlicensed SLS Waiver Personal Care providers	\$3,000	\$2,200
Renewal cost	\$1,550	\$1,325

For more information on the rules that licensed agencies must follow, visit 6 CCR 1011-1 Standards for Hospitals and Health Facilities Chapter 2 General Licensure Standards and 6 CCR 1011-1 Standards for Hospitals and Health Facilities: [Chapter 26 - Home Care Agencies](#).

Action To Be Taken by Providers:

Previously, the Colorado Department of Public Health and Environment (CDPHE) waived initial licensure fees for existing SLS Waiver Personal Care providers that did not have a Class A or Class B license (Specialty 664 Personal Care) that applied for a license prior to September 30, 2024. There are additional funds remaining from this project that CDPHE and HCPF are allocating to incentivize more Program Approved Service Agencies (PASAs) to provide Personal Care under CFC. Thus, CDPHE will waive initial licensure fees on a first-come, first-served basis for PASAs (regardless of which services they currently provide) that do not currently have a Class A or a Class B license that submit a complete application for a Class A or Class B license on or before June 16, 2025.

The first step of the application for a license is to submit a [Letter of Intent](#) to CDPHE by April 15, 2025. CDPHE will contact applicants after they complete the Letter of Intent with instructions for the initial licensure process. The Letter of Intent does not require providers to apply for a license or guarantee approval. Submission of the Letter of Intent is just the first step for those agencies interested in applying for licensure. Providers choosing to apply for a Class A or Class B license after funding for this project is depleted, or after June 16, 2025, will be responsible for paying the initial licensure fees.

The application and provider enrollment process takes approximately 8 months to complete. Due to the length of time the enrollment process takes, applications submitted as part of this grant project at this time will not be approved prior to CFC implementation. However, receiving a license will allow the agency to provide Personal Care under CFC once approved. After CFC goes live in July 2025, members will transition onto CFC at their Continued Stay Review (CSR). As soon as the member transitions onto CFC, the member will no longer be able to receive Personal Care services through their waiver. Therefore, their provider will not be able to bill for Personal Care under the SLS Personal Care 664 specialty.

What options do PASAs have once CFC is implemented?

1. Provide Personal Care under CFC. Obtain a Class A or Class B license by completing these steps:
 - a. Submit a Letter of Intent by April 15, 2025.
 - b. Submit a complete application for a Class A or Class B license with CDPHE by June 16, 2025.
 - c. Complete the survey process with CDPHE.
 - d. After receipt of license, submit a maintenance application through the Gainwell Provider Portal to add Specialty 666 Personal Care/Homemaker Services BI/EBD/CIH/CMHS to your existing Home and Community-Based Services enrollment.
 - e. Personal Care providers enrolled with the 666 HCBS Personal Care specialty will be automatically enrolled as CFC providers when CFC goes live.
2. Discontinue providing Personal Care and provide Homemaker services only. Steps:
 - a. Apply for an Initial Certification or Add Service Certification for Homemaker services from CDPHE.
 - b. Enroll with HCPF as an HCBS Homemaker provider under HCBS using specialty code 652 for the SLS waiver.
 - c. Providers already enrolled as a Homemaker provider need not take action.

My PASA already has a Class A or B license, what do I need to do?

Existing SLS Personal Care Providers that already have a Class A or Class B license should enroll in Specialty 666 Personal Care/Homemaker Services with the Department no later than June 30, 2025. For more information on enrollment, visit the licensure and enrollment resources, linked below. To enroll, follow the provider enrollment link through the Provider Enrollment Portal, linked below. For any questions or issues with enrollment, contact the Provider Services Call Center at 1-844-235-2387.

Action To Be Taken by Case Managers and Members:

Since Aug. 1, 2024, HCPF has been uploading a list to each CMA folder located within the CMAs SharePoint site of SLS Personal Care providers that are enrolled in the 664 specialty code and do not have a Class A or Class B license. HCPF updates this list monthly. This list will include providers that have expressed interest in obtaining a Class A or Class B license, providers that have an active application for a Class A or Class B license, and providers that are not currently pursuing a Class A or Class B license. Case Managers should flag any providers on this list that are providing Personal Care on the SLS waiver to one of their members. Then, in the next contact between the member and the Case Manager, the Case Manager should let the member know of their providers status in this transition. For example, if a member's provider has not begun the application process, the Case Manager should notify the member of this information. At the time of the member's Continued Stay Review (CSR) between July 1, 2025, and June 30, 2026, any member on the SLS waiver receiving Personal Care from a Personal Care provider without a license will need to switch providers.

If the member wants to continue to receive care from their caregiver, but their provider that did not obtain a Class A or Class B license, they can follow the steps in the below two options.

1. Enroll in HCBS Consumer-Directed Attendant Support Services (CDASS): If a member wants to continue receiving care from a caregiver employed by their PASA when they transition to CFC services, the member can work with their Case Manager to enroll in CDASS and hire the caregiver as their attendant. To enroll in CDASS, the member must be able to direct their own services or assign an Authorized Representative. The Authorized Representative and attendant cannot be the same person. Enrollment in CDASS can begin prior to CFC enrollment because CDASS is available to SLS members. If there are existing concerns or questions regarding CDASS, the member should contact their Case Manager and/or HCPF to have those conversations.
2. Enroll in In-Home Support Services (IHSS) at the time of CFC enrollment: If a member wants to continue receiving care from a caregiver employed by their PASA when they transition to CFC services, the member can work with their Case Manager to enroll in IHSS and select an IHSS Agency to work with. After selecting an IHSS agency, the member will work with their IHSS agency to hire their desired caregiver as their IHSS attendant. IHSS attendants must be at least 16 years of age and demonstrate competency to complete the skills on the care plan. To enroll in IHSS, the member must be able to direct their own services or assign an Authorized Representative. The Authorized Representative and attendant cannot be the same person.

3. Change providers: If a PASA does not choose to get a Class A or Class B license, and the member does not want to enroll in CDASS or IHSS, the member will need to work with their current PASA and Case Manager to find another Personal Care provider.

Attachment(s):

[6 CCR 1011-1 Standards for Hospitals and Health Facilities Chapter 2 General Licensure Standards](#)

[6 CCR 1011-1 Standards for Hospitals and Health Facilities: Chapter 26 - Home Care Agencies](#)

[CDPHE License Letter of Intent](#)

[Community First Choice Website](#)

[Department HCBS Provider Enrollment Webpage](#)

[Provider Portal Adding A Specialty Quick Guide](#)

[Provider Enrollment Portal](#)

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