COLORADO
Department of Health Care Policy & Financing

POLICY MEMO

Title: Physician Attestation of Member Capacity for Children	**Topic:** Benefits
Audience: In-Home Support Services (IHSS) Agencies, IHSS members, Community First Choice (CFC) and Home and Community-Based Services (HCBS) Case Managers	**Sub-Topic:** Administrative Policy
Supersedes Number: N/A	**Division:** Benefits and Services Management Division
Effective Date: July 1, 2025	**Office:** Office of Community Living
Expiration Date: July 1, 2028	**Program Area:** Participant-Directed Programs
Key Words: In-Home Support Services, IHSS, Participant-Directed Programs, Physician Attestation of Member Capacity, PACC, PA Form, Consumer-Directed Attendant Support Services, CDASS, Self Direction, Consumer Direct for Colorado, CDCO	
Legal Authority: C.R.S. 25.5-6-1202	
Memo Author: Amanda Smith	
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HCPF Memo Series can be accessed online: https://www.colorado.gov/hcpf/memo-series

Purpose and Audience:

The purpose of this Policy Memo is to clarify for Case Managers, IHSS Agencies, members, families, and other interested stakeholders the In-Home Support Services (IHSS) policy requirements for the Physician Attestation of Consumer Capacity (PACC) form for children when enrolling in Participant-Directed Programs.

Information:

The Department of Health Care Policy and Financing (HCPF) is removing the requirement to obtain a Physician Attestation of Consumer Capacity (PACC) form for children who are enrolling in or receiving IHSS services.

Historically, the PACC form was completed by a member's primary care physician to determine if the member could direct their own care, or if not, would require an Authorized Representative (AR) to help them direct their care.

Children under the age of 18 are required to have an Authorized Representative (AR) who provides support with decision-making and helps ensure the child's needs are met in IHSS. Since an AR is required for all children under the age of 18, completing the PACC is not necessary.

Action To Be Taken:

Case Management Agencies should not request or require the PACC form for members under the age of 18. They must confirm that an AR is in place via the AR designation and attestation on the IHSS Shared Responsibilities Plan. Case managers must ensure all required forms are complete prior to the start of services for IHSS as outlined in10 CCR 2505-10 8.7528.I.9.

IHSS Required Forms

Form Name	Form Description
Physician Attestation of Consumer Capacity (PACC)	Required for anyone over the age of 18 and completed by the member's primary care physician.
IHSS Shared Responsibilities Plan	Required for all IHSS members and completed by the member and/or AR with support from their IHSS agency.
Direct Care Services Calculator (DCSC)	Required for all IHSS members and completed by the Case Manager and/or Nurse Assessor.

IHSS Agency Care Plan	Required for all IHSS members and completed by the IHSS Agency.
Prior Authorization Request (PAR)	Required for all IHSS members and completed by the Case Manager.

There is no change to the requirement that Case Managers obtain the Shared Responsibility Plan.

Attachment(s):

None

HCPF Contact:

Participant-Directed Programs Unit

HCPF_PDP@state.co.us