



# Home Modifications

Elderly, Blind, and Disabled (EBD), Brain Injury (BI),  
Complementary and Integrative Health (CIH formerly  
SCI), and Community Mental Health Supports (CMHS)  
Waivers

October 2022



**COLORADO**  
Department of Local Affairs



**COLORADO**  
Department of Health Care  
Policy & Financing



# HCPF and DOH: Who Does What?

## Health Care Policy and Financing (HCPF)

- Rules/Policy
- Payment (3rd Agent) and Payment Adjustments
- Oversight of Case Management Agencies (CMAs)
- Consultation and Oversight of Appeals with CMAs
- Provider Enrollment/Termination
- Program Integrity
- Review of Vehicle Mod and AT requests

## Department of Local Affairs/Division of Housing (DOLA/DOH)

- Administers home modification program with direction from HCPF
- Ensures compliance of home modification rule/policy

# What is a *Home Modification?*

In the Home and Community Based Services (HCBS) Brain Injury (BI), Community Mental Health Supports (CMHS), Complementary and Integrative Health (CIH-formerly Spinal Cord Injury), Elderly, Blind, Disabled (EBD) waivers, Home Modifications are defined as:

- Physical adaptations to the Member's **primary residence** that
  - Are necessary to ensure the health and safety of the Member,  
**AND**
  - Enable the Member to function with greater independence in the home, **AND**
  - Are required because of the Member's illness or disability,  
**AND**
  - Are necessary to prevent institutionalization or support deinstitutionalization of the Member.

[10 CCR 2505-10 8.493.1](#)

# How much funding is available?

There is a lifetime cap of \$14,000 per client.

## What if the home modification costs more than \$14,000?

HCPF may authorize funds in excess of the client's lifetime cap if there is:

1. An immediate risk of being institutionalized; or
2. A significant change in the client's needs since a previous home modification

# What settings are eligible for a Home Modification?

## **Rental Property - Yes**

8. 493.4.F If a property to be modified is not owned by the client , the Case Manager shall obtain signatures from the homeowner or property manager on the submitted bids authorizing the specific modifications described therein.

## **Congregate Housing - No**

8.493.3.F. Home Modification projects are not a benefit in any type of certified or non-certified congregate facility

## **Federally Subsidized Housing - No\***

8.493.3.H. If a client lives in a property where adaptations, improvements, or modifications as a reasonable accommodation through federally funded assisted housing are required by the Fair Housing Act, the client's Home Modification funds may not be used unless reasonable accommodations have been denied.

\*The Division of Housing is not an enforcement agency. Members being denied a modification by their landlord will need to contact the local fair housing enforcement agency.

# What can Case Management approve?

Home Modifications \$2499 or less	YES
Installation of Durable Medical Equipment (DME)	YES
Purchase of DME	NO
Repairs to an existing home modification/ service calls	YES
Repairs to a “bad” home mod	NO*
General home repairs	NO
Home Modifications in federally subsidized properties	NO
Change order requests to an already approved home modification	NO

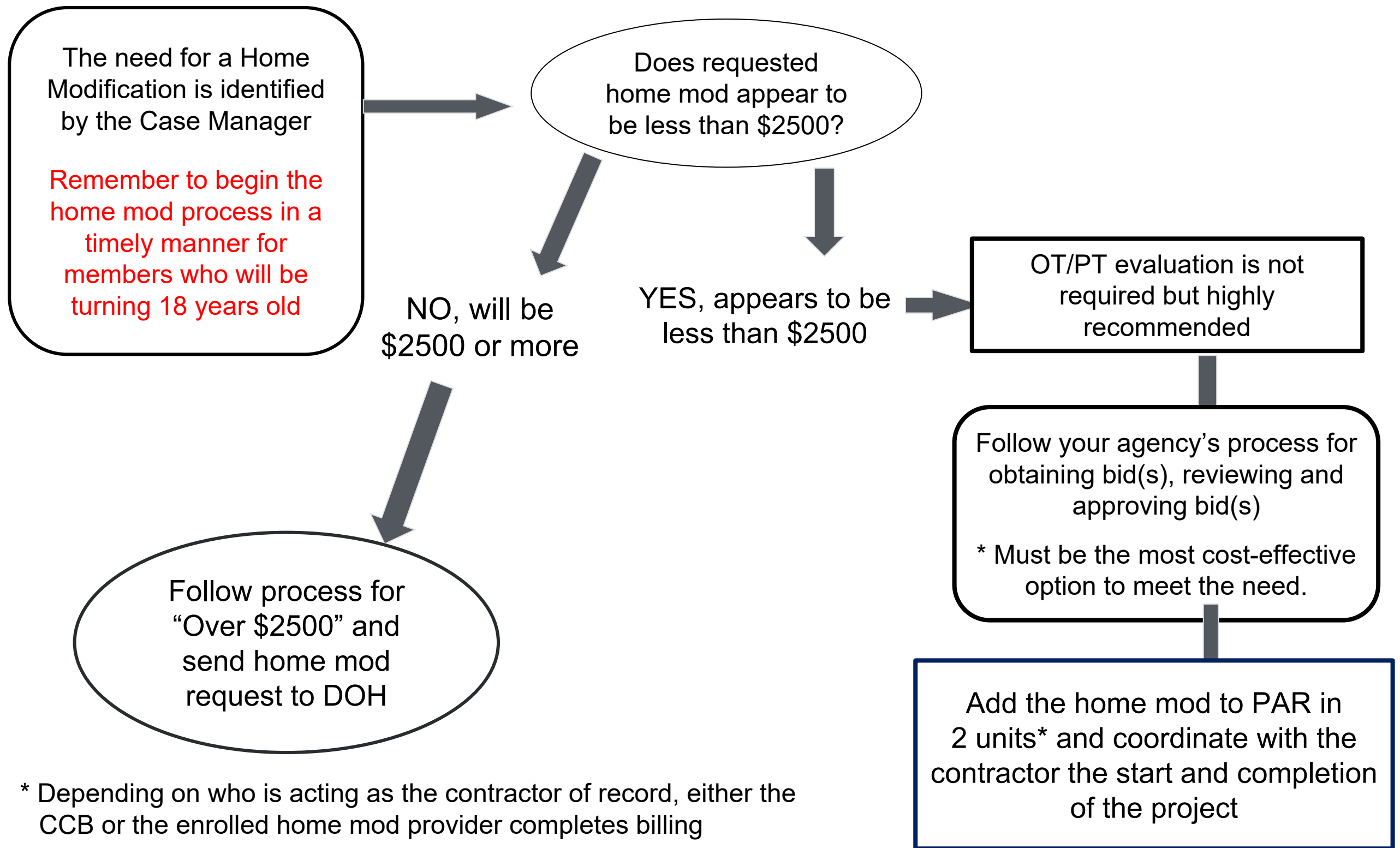
\*All home modifications are covered under a one-year warranty, which must be utilized prior to additional funding being approved.

# What do Case Managers need to remember?

- OT/PT evaluation is not required for home mods \$2499 or less but highly recommended.
- All home modifications must comply with Home Modification regulation found in 10 CCR 2505-10, [Section 8.493](#)
- Case Managers must verify if the member has adequate funds
- Home mod expenditures are cumulative during the members certification period and have a lifetime limit
- Any changes to the status of a member must be reported to the contractor

**Case Managers are encouraged to use the new [Home Modification Checklist Tool](#) for each member who requests to use Home Modification services.**

# Home Mod Process for UNDER \$2500





# QUIZ: Home Modifications under \$2500

**True or False:** Case Managers can approve **anything** as long as it is \$2499 or less.

**FALSE** – All home mods, regardless of amount, must still comply with all of the rules and regulations

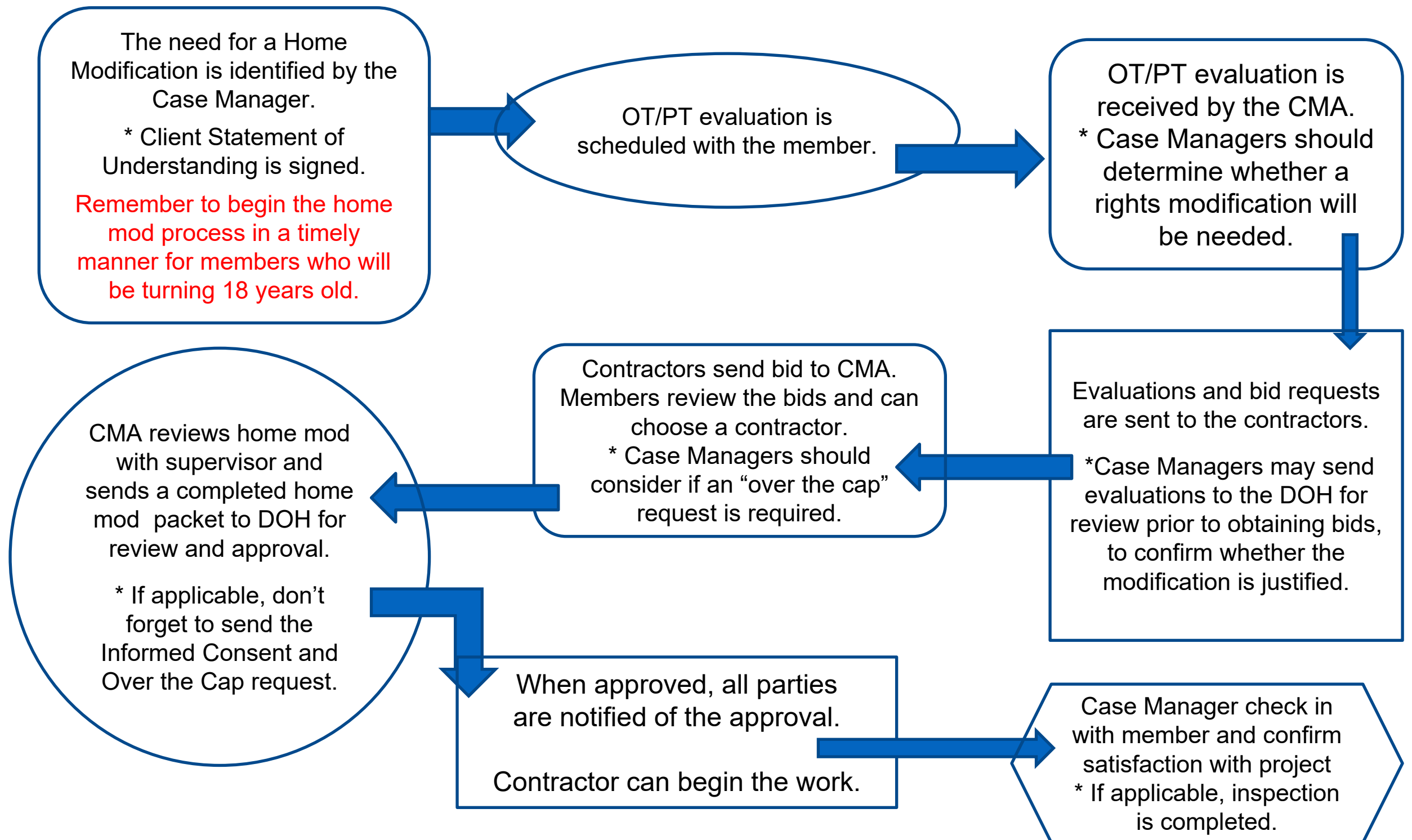
**True or False:** OT/PT evaluations for home mods that are \$2499 are not required.

**TRUE** – Although not required, it is still highly recommended to obtain an OT/PT evaluation

**What about home mod requests  
that are \$2500 or more?**

# Home Modification Approval Process

## Home Mods \$2500 or more





# Home Modification Requests

- The [Home Modification Checklist tool](#) should be used as the first page of the home modification request and all Case Managers should check the request to ensure that all documents are present and completed All home modification requests should be reviewed by a supervisor before sending to DOH
- **All home modification requests should be reviewed by a supervisor before sending to DOH**
- If the request is not complete when it is submitted to DOH it will be returned to the Case Manager and the supervisor and the Case Manager will need to make all necessary corrections and resubmit the request

# Home Modification Evaluations

- Completed by Occupational Therapist/ Physical Therapist or HCPF approved qualified individual
- Evaluations must be completed on the [Health First Colorado Home Modification Evaluation Form](#)
- Recommendations must be based on the member's individual needs and **not based on the member's "wants" and/or a contractor's opinion**
- Evaluations should be completed in the home that is to be modified
- Evaluations should be reviewed for quality and appropriateness by the Case Manager before being sent to DOH

*Case Managers may send evaluations to DOH for review prior to obtaining bids, to confirm whether the modification is justified*

# Home Modification Providers

- Case Management Agencies are responsible for maintaining their own list of local providers for this benefit.
- Case Management Agencies must notify the DOH of Home Modification provider shortages in their catchment area when this results in member being unable to access this benefit
  - DOH and HCPF staff will then work with the agency to explore additional options for members to access this benefit



# Rights Modifications/Informed Consent

- Documentation of a Rights Modification is required for any home modification that restricts a member's rights. This is applicable for all members participating in HCBS waiver programs and electing the Home Modification benefit.
  - Refer to [OM 21-032](#) and [OM 20-103](#) for Rights Modifications instructions.
  - Informed Consents must be signed annually by the member or guardian.

[10 CCR 2505-10 8.484.5](#)

# When is documentation of a Rights Modification required?

Examples of Home Modifications requiring documentation as Rights Modifications are:

- Sensors to notify a caregiver of the member's egress
- Locks for a refrigerator or cabinets in a home to prevent excessive eating based on a diagnosis such as Prader Willi Syndrome.

# Rights Modifications/Informed Consent

This is not a comprehensive list of Home Modifications that constitute a Rights Modification. For additional information on Rights Modification and Trainings please review the “Training Materials Presented by the Department” & “Additional Departmental Guidance” sections of the [HCBS Settings Final Rule website](#).

- Case Managers are also encouraged to review [Information Memo 22-028](#) and share the new informational videos regarding Member Rights and Rights Modifications with Members, Guardians, Families, and Providers.
- This is a link to the [YouTube Playlist](#). The department’s videos are available in both English and Spanish.



# Bidding Process

- Solicit bids from at least (2) contractors – enrolled home mod providers
- Contractors must use the [Home Modification Provider Bid form](#)
- Contractors have 30 days to submit their bids
  - If after 30 days only one contractor has responded, please move forward with that bid, unless the client/family wants to keep trying for another bid
- Contractors must follow the OT/PTs recommendations.  
Contractors can and should be addressing construction related information: structural issues, applicable codes, permits, etc.
- If the client/family does not have a contractor preference, then only the lowest bid will be reviewed.

# Home Modification Packet

Send all initial home mod requests to: [dola\\_homemod@state.co.us](mailto:dola_homemod@state.co.us)

1. Client ID and/or current PAR #
2. Current contact info to include address and phone number
3. Signed Client Statement of Understanding
4. Evaluation completed by the OT/PT or other approved professional using the most current evaluation form

Include all pictures and/or drawings

5. All the bids that were received OR explanation why only one bid was received
6. Client's contractor preference
7. All contractor's pictures and/or drawings
8. Property Owner Consent Form- even if the client is the property owner or lives with the property owner, the release is still needed
9. If applicable, HOA/Mobile Home Park release for all exterior work  
Condo HOA may also need to provide a release for interior work
10. If applicable, Rights Modification paperwork
11. If applicable, justification to exceed the \$14k cap

**All of the above information is REQUIRED when submitting a home modification request. If a request is missing one of these required items the request will be returned to the CM for completion**

All forms required for submission to DOH can be found on the Department's [Home Modification web page](#).



# QUIZ: Home Mod Packet

**True or False:** All initial home modification requests over \$2499 must be sent to [dola\\_homemod@state.co.us](mailto:dola_homemod@state.co.us)

**True**

**True or False:** If the member owns the home, a Property Owner Consent Form is not needed.

**False** – Property Owner Consent Form is required for all home modifications.

**True or False:** Should a Case Manager send in documents for a home modification request to DOH as they receive them?

**False** – The packet should be complete and have all the required documents prior to submitting to DOH



# DOH Approval Process: Home Mods \$2500 or more

Contractors and Case Managers will receive home mod approval notices from: [dola\\_homemod@state.co.us](mailto:dola_homemod@state.co.us)

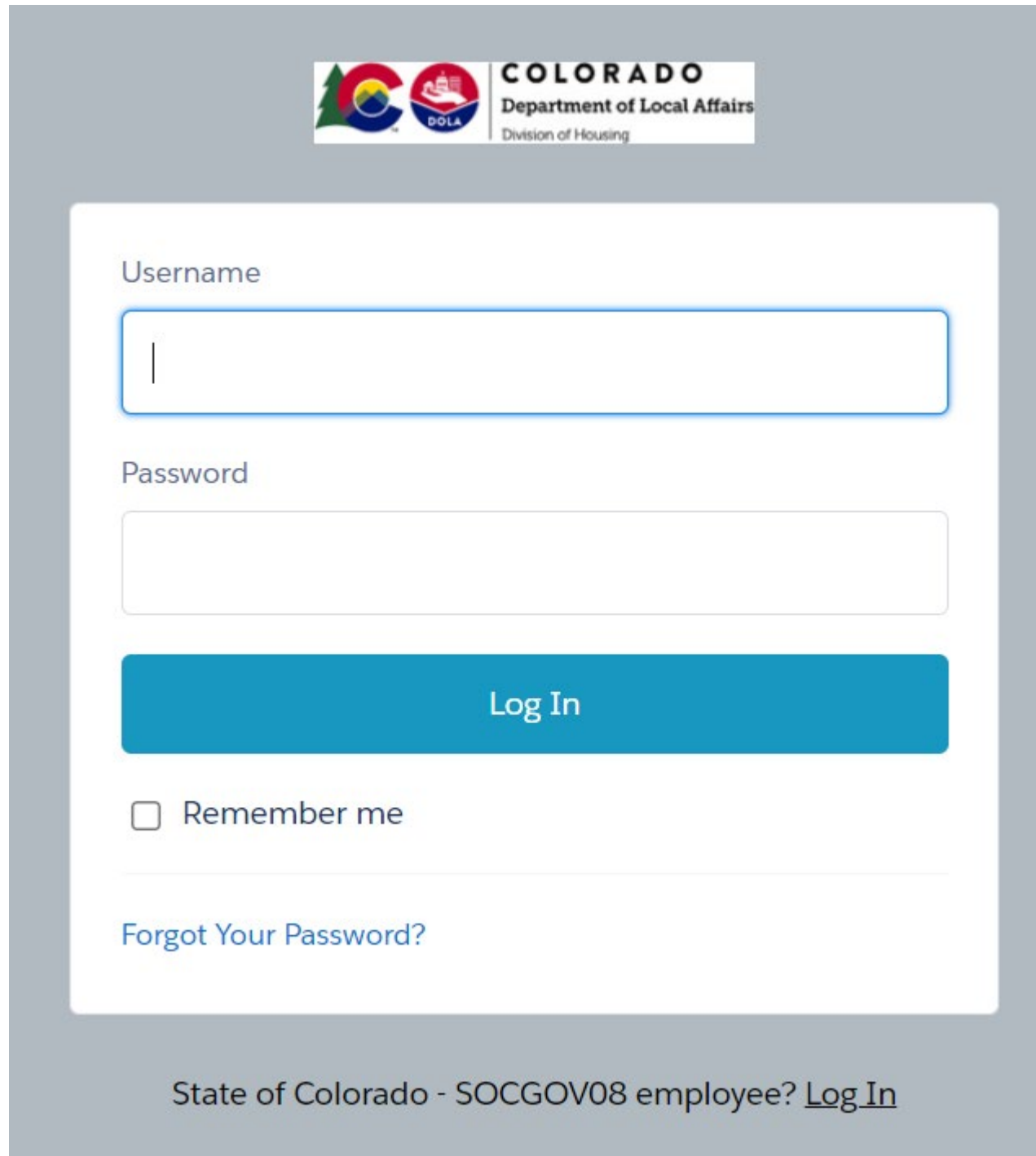
- The **subject** line will read: **Approved PAR (P0000) with the client's initials**
- The **body** of the email will contain a link to the DOH portal

To avoid confusion, please do not forward these approvals to an enrolled home mod provider. They will receive the approval notice from DOH.

## Why is this important?

If any work is done on a project that was not DOH approved, both the CMA and the contractor may be held financially liable.

# How to Use the DOH Portal



The screenshot shows the login interface for the DOH Portal. At the top, there is a header with the Colorado Department of Local Affairs (DOLA) logo and the text "COLORADO Department of Local Affairs Division of Housing". Below this, the login form is contained within a white box with a light gray border. It features a "Username" label above a text input field, a "Password" label above another text input field, and a blue "Log In" button. Below the button is a checkbox labeled "Remember me". At the bottom of the form is a link that says "Forgot Your Password?". Below the form box, there is a footer line that reads "State of Colorado - SOCGOV08 employee? [Log In](#)".

Bookmark this web page:

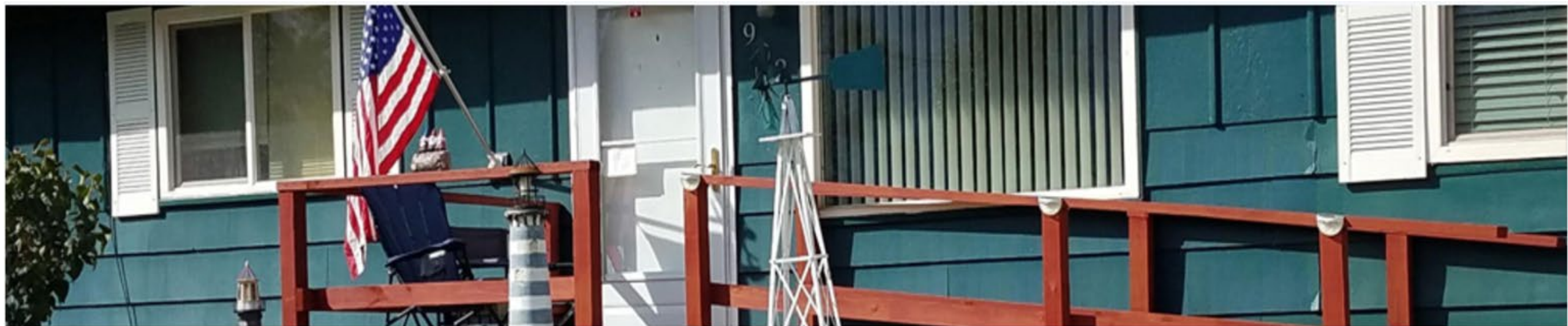
<https://socgov08.force.com/DOHHM/login>

# How To Use the DOH Portal cont.

Click on the client's name

If you do not see the client's name, enter their name in the Search box  
(yellow highlighted box)

If you still cannot find the client then contact DOH



## Welcome to the Home Modification Portal

Below is a list of your projects. Click on a record to access detail information about the project.

All ▼

2 items • Sorted by Project Name • Filtered by All projects • Updated a few seconds ago

Search this list...

	Project Name ↑	Last Modified Date	Date ...	Inspe...	Inspe...	Case Manager	Date ...	Date of ...	Comple...	Contractor...	Date P...	
1	Test Client CO1	5/17/2020 7:40 AM				Test Case Manager		12/1/2018		Test Provider		▼
2	Test Client Project	10/28/2020 1:49 PM				Test Case Manager		2/21/2018	2/25/2019	Test Provider	5/1/2018	▼

# How to Use the DOH Portal cont.

Project ID  
P01869

Project Name  
Test Client Project

Program  
Home Modification

Total Project Amount  
\$14,000.00

Last File Uploaded

## Asset Information

Asset Client  
Test Client 1

Asset Street  
1313 Sherman St.

Asset City  
Denver

Asset State

Asset Zip  
80204

Record Type  
Home Modification

Owner  
Tierra.Powell

Type  
Initial

Status  
Completed

Modification Type  
Ramp-Front Entrance;Ramp-Rear Entrance;Railing-Front Entrance;Railing-Rear Entrance;Bathroom-Walk in shower  
Other

DME Installation  
2 shower gbs; toilet gb

Medicaid Client ID Number

PAR Number

Primary Asset Contact  
Test Client 1

Primary Asset Contact Phone  
(303) 864-8425

Alternate Asset Contact

Alternate Asset Contact Phone

## Update Project Completion Date

The Project Completion Date for this project has been set to:

February 25, 2019

To modify this date click **Next**.

Next

## Upload Files

Upload

Upload Files

Or drop files

Once you complete uploading your files, click **Next** to continue.

Next

## Project Files

Files Uploaded



# How to Use the DOH Portal cont.

## ✓ Project Information

Case Manager

[Test Case Manager](#)

OT/PT

## ✓ Contractor/Provider Information

Contractor/Provider

[Test Provider](#)

Construction Progress Notes

Contractor Email

[tierra.powell@state.co.us](mailto:tierra.powell@state.co.us)

Contact

PAR Progress Notes

One bid rec'd

Start date

Expected Completion Date

7/30/2018

Extension Date

Completion date

2/25/2019

Project Complete 



## ✓ Timeline

Date of OT/PT evaluation


2/21/2018

OT/PT Addendum Date 

3/30/2018

Date PAR Received by DOH

4/1/2018

Date PAR Approved by DOH 

5/1/2018

Created By

[Tierra Powell](#) , 8/16/2018 8:35 AM

Initial Bid Date

Last Modified By

[Test Contractor](#) , 10/28/2020 1:49 PM





# Home Modification Denials

When services are disapproved, in whole or in part, the Department or its agent shall notify the case management agency. The case management agency shall notify the Client of the adverse action and the appeal rights on a state-prescribed form ([10 CCR 2505-10, 8.485.90.92](#)).

- Case Managers must issue an 803 Notice of Action for all Home Modification denials
- DOH staff provide Case Managers with regulatory citations with all denials for this specific purpose
- Members must be notified of all Home Modification denials and provided with their appeal rights

# What Does the Contractor Need To Do?

- After receiving the notice of an approval from the DOH, a contractor has 60 days to start the project then 30 days to complete the project
- Contractors may request an extension for unforeseen or unexpected delays by contacting the DOH or HCPF. These extensions must be requested by the contractor within the 90-day timeline.
- Contractors have been instructed to review the final approved bid with the client prior to starting any work
- Contractors must submit all change order requests to the DOH for review and approval
- Contractors must provide a one-year warranty

# Case Manager Actions for Complaints?

**FIRST** – The Case Manager should be sure the contractor has been notified and given the opportunity to address the client's concerns. Contractors are required to provide a one-year warranty.

**THEN** – The Case Manager should contact DOH staff as soon as possible if the contractor has not responded in a timely manner or if issues still remain - especially **during** construction

Case Managers should notify DOH immediately if you become aware of any inappropriate behaviors being exhibited by the contractor and/or their employees, subcontractors, etc.

All complaints are inspected. The contractor is responsible for addressing deficiencies that are the fault of the contractor.

Funds can be recouped from the original contractor

Client can choose a different contractor to make the corrections

# American Rescue Plan Act (ARPA)

- ARPA may provide up to \$10,000 in additional funding to clients who are eligible for the Home Modification benefit
- All ARPA home modification requests are reviewed and approved by DOH
- Home Modification rules/processes must be applied to the ARPA funding. Members can choose to utilize ARPA funds or make an Over the Cap request. **Case Managers must note what funding type is being requested when the Home modification request is submitted**
- Home Modification waiver benefit must be fully utilized before ARPA funding can be accessed
- **ARPA funding is limited and is available until March 2024**

# HB18-1267 Tax Credit for Home Mods

[House Bill 18-1287](#) allows taxpayers to claim a state income tax credit for up to \$5000 of qualified costs incurred while retrofitting their residence for the purpose of improving accessibility, increasing visit-ability, or allowing qualified individuals to age in place. The credit is available for tax years 2019-2023.

This is **not** a Medicaid funded program or a grant or a loan program.

Qualified individual – state income taxpayer with a disability, illness or impairment or a spouse/dependent with a disability, illness or impairment whose primary residence will be retrofitted and has a qualifying annual family income.

Available to homeowners and renters.



# Questions and Technical Assistance



# Contacts for Guidance

## Health Care Policy & Financing (HCPF)

**Policy, process and provider questions:**

Emily Walsh

[Emily.Walsh1@state.co.us](mailto:Emily.Walsh1@state.co.us)

303-866-5064

**Case Management questions:**

Lydia Beals

[Lydia.Beals@state.co.us](mailto:Lydia.Beals@state.co.us)

303-866-4076

## Division Of Housing (DOH)

**Project approval, bids, contractor and inspection questions:**

Naomi Hubert

[Naomi.Hubert@state.co.us](mailto:Naomi.Hubert@state.co.us)

303-864-7825

Ken Neider

[Ken.Neider@state.co.us](mailto:Ken.Neider@state.co.us)

303-482-7670

**Send initial home mod packets to:**  
[dola\\_homemod@state.co.us](mailto:dola_homemod@state.co.us)