

# Home Modification Stakeholder Engagement

November 10, 2021

Presented by:  
Department of Health Care Policy & Financing  
and  
Department of Local Affairs-Division of Housing





# Our Mission:

Improving health care equity, access and outcomes for the people we serve while saving Coloradans money on health care and driving value for Colorado.



# Meeting Purpose

To improve current home modification processes to better align with industry best practices and to increase the accessibility and equitability of home modifications across all Health First Colorado Medicaid Waivers.



# Agenda

1. Housekeeping
2. Introductions
3. SWOT Analysis Review and Next Steps
4. Occupational/Physical Therapist Form Revisions
5. Rights Modification and Home Modification Training
6. Technical Assistance
7. Upcoming Meetings
8. Adjourn

# Housekeeping

- Mute your mic if you are not speaking
- Use the “raise your hand” feature if you’d like to ask a question before we pause for breaks; or,
- Type your question in the chat box
- If you are on the phone, unmute by pressing \*6 to ask a question
- We are recording! Please do not share protected health information (PHI) during this meeting
- Send follow up questions to [danielle.krause@state.co.us](mailto:danielle.krause@state.co.us) or fill out the [Home Modification Stakeholder Feedback](#) Google Form found on the Department [Home Modification](#) page



# Introductions



**COLORADO**

Department of Health Care  
Policy & Financing

# SWOT Analysis



# SWOT: Strengths

Strengths Identified	Votes	Notes
Construction knowledge of Division of Housing (DOH) staff	3	
DOLA's knowledge of different waivers within DOH		CMA's don't need to go to multiple agencies
Responsiveness of DOH staff		
Ability of the program to support members to remain living in their homes		In rural community, they work together to ensure people are receiving these services.
Consistencies amongst CCBs/SEPs by having state level reviews		Allows members to have a more consistent experience.
Documentation process and training provided is rather straightforward		
Home modifications are an offered benefit under HCBS		
The process starts with an OT evaluation		
Some of the providers have showrooms where CMs/Members can see the equipment and how it works		



# SWOT: Weaknesses

Weaknesses Identified	Votes	Notes
Different criteria and funding for the different waivers. Requirements amongst the waivers could be more consistent		
Unclear who to contact or who needs to contact who, can cause delays	2	Communication between HCPF/DOH/CMA
Lack of providers- OT/PT, contractors	2	Particularly in rural areas
Working with third party contractors.		
Perception that it is burdensome for contractors to work with the state		
Need for back-and-forth conversation with OT/PTs, particularly for requests that are cognitively based		
Nursing home transitions		Difficult for members to get home mod but are not yet eligible for HCBS as they are currently enrolled in SNF... transition services
Approval process can be lengthy. Ensuring that needs are met prior to transitioning off of waiver (CES-DD)	2	
Billing Medicaid can be confusing.		
Therapists are not really involved after the evaluation is completed.		Short term rehab service.
Prior authorization for small repairs. Is this required?		

# SWOT: Opportunities

Opportunities Identified	Votes	Notes
Increasing the cap	2	
Make going over the cap more accessible		
Rule revisions (clarity and consistency)		
Opportunities to network with other resources		
Use DME more		Potentially use DME until home modification can be completed.
Opportunity to focus on care coordination		Focus on the strengths of each professional. Establishing roles early in the process so that each person is doing what they're best at.
Opportunity to create a document/website that is accessible for members/families-- streamline process	2	Website for families to have access to clear guidance and expectations for the process.
Opportunity to make families aware of the appeal process for things that are denied in the home modification request.		
Opportunity to engage members/families in the process in general.		Specifically looking for more information surrounding living space. More questions added to the evaluation form.
OT/Provider recruitment. Perhaps incentivize travel for rural areas.		
Additional training for CMs regarding home modification options		Provide a general awareness of the options that may be available or may be better solutions for members (DME vs. home mod, etc.)

# SWOT: Threats

Threats Identified	Votes	Notes
Lack of providers (OT/PT, contractors)	3	
Delays in supplies		
Lack of subcontractors, delays from vendors.		Could be temporary
Provider enrollment process		Difficult for people who are not tech savvy
Case manager turnover		Delays in training, can slow down the process.
Availability of contractors	2	Booked out for months
Recruiting providers to work with Medicaid projects when they may have work available on higher paying private contracts		
Increase in cost of materials. Cap for home mods has remained the same.		Particularly during COVID
Pandemic and public health restrictions in general		A lot of our members engage better in face-to-face contact. There may be a lack of engagement from members who are struggling with remote contact. Members who may need the service may not be engaging and receiving the benefit.
When CCB subcontracts, concerns that they do not have as much support from DOLA to ensure the quality of work for modifications.		
Delays due to inefficiencies within the home mod process (may also be a weakness)		

# Summary

Strengths	Weaknesses
<ul style="list-style-type: none"><li>• Construction knowledge of DOH staff</li></ul>	<ul style="list-style-type: none"><li>• Lack of providers- OT/PT, contractors</li><li>• Approval process can be lengthy. Ensuring that needs are met prior to transitioning off of waiver (CES-DD)</li><li>• Unclear who to contact or who needs to contact who, can cause delays</li></ul>
Opportunities	Threats
<ul style="list-style-type: none"><li>• Increasing the cap</li><li>• Opportunity to create a document/website that is accessible for members/families-- streamline process</li></ul>	<ul style="list-style-type: none"><li>• Lack of providers (OT/PT, contractors)</li><li>• Availability of contractors</li></ul>

# Next Steps

- To streamline the approval process:
  - Revamp Home Modification forms
  - Revamp Home Modification trainings
- Create easy to access materials for members and families wishing to pursue the Home Modification benefit
  - Add information to the Department's Home Modification webpage specifically for families
- Increasing the cap
  - American Rescue Plan Act funding



# Feedback?

Home Modification Stakeholder Feedback Form:

<https://forms.gle/f7yJjpSySQxHJUzv8>

# OT/PT Form Revision



# Home Modifications and Rights Modifications

- 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.
  - Federal Regulation 42 C.F.R. § 441.301(c)
  - 10 CCR 2505-10 8.608.1 E current regulation
  - [10 CCR 2505-10 8.484 Home and Community-Based Services Settings Final Rule](#) (Forthcoming)
- Refer to [OM 21-032](#) and [OM 20-103](#) for Rights Modifications instructions.
- Rights Modifications and informed consents must be reviewed at least annually.
- **Rights Modifications for Home Modifications** are not required to go through the HRC review process.

# Home Modifications and Rights Modifications

- Case Managers will need to complete the informed consent form for the member.
- Case Managers will need to meet with the member/guardian/family to complete the informed consent and obtain a signature.

If you agree with this Rights Modification, please sign below or sign electronically.

_____	_____
Individual signature	Date
_____	_____
Guardian/other authorized legal representative signature (if applicable)	Date
_____	_____
Case Manager signature	Date

# Home Modifications and Rights Modifications

- The [Informed Consent Template](#) has 6 required questions that must be answered in plain, person-centered language. The italicized text is removed and replaced as it is completed.
- If the member is under the age of 18 their parent or guardian may sign the form for the member.

1. Description of your proposed Rights Modification for the period \_\_/\_\_/\_\_ -  
\_\_/\_\_/\_\_

*Specify what right will be modified and how it will be modified, to be sure the individual understands what to expect. (For example, “your right to come and go will be modified in that staff will always accompany you when leaving your home, except when you are at work or with your family,” or “your right to privacy will be modified in that you will not lock your bedroom door, in case staff need to come in to help you during a seizure.”) Be sure to address only one Rights Modification per form. This helps you to complete the narrative clearly and in turn, ensure that the individual understands each right that is affected and each modification being proposed. As part of describing the proposed Rights Modification, state when it will be in effect. The start date is the date on which all required signatures are obtained (below) or later. The end date can be up to one year after the start date and can be earlier. If a similar Rights Modification is used in later periods, complete a fresh form with new dates, and update any other information in the form as appropriate.*

# Home Modifications and Rights Modifications

- Examples of Home Modifications requiring a Rights Modifications are:
  - A fence for a yard to prevent a member from eloping.
  - Locks for a refrigerator or cabinets in a home to prevent excessive eating based on a diagnosis such as Prader Willi Syndrome.

**\*\*Case Manager remember to review the [Age Appropriate Guidelines](#) before pursuing requests for members under the age of 18.\*\***



# Home Modifications and Rights Modifications

- Reminder: there is an online, self-paced training that is available for providers and case management agencies.
- [Informational Memo](#)
- [Training recording](#)
- [Training slide deck](#)
- Questions can be directed to [lydia.beals@state.co.us](mailto:lydia.beals@state.co.us)



# Technical Assistance

Open Forum for Question and Answer  
with HCPF & DOLA staff



# Upcoming Meetings

December 8, 2021

- Revisions to Home Modification Forms Continued

# Upcoming Home Modification Trainings

## CCB Home Modification Training

Tuesday, January 11, 2022

10:00 a.m.- 12:00 p.m.

## SEP Home Modification Training

Thursday, January 13, 2022

1:00 - 3:00 p.m.



# Topic Suggestions

Please submit any follow up questions and future meeting topic suggestions through this form:

<https://forms.gle/NfN7uNhS8S3StkRQA>



# Contact Info

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# Thank you!

