

Support Level and Safety Risk Factor Bridge System Enhancements

For HCBS-SLS and HCBS-DD Waivers

Presented by: The Office of Community Living

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Purpose

Clarify the process to document Safety Risk Factors/Values in the Bridge

**Review Support Level and Safety Risk Assessment -
system enhancements in the Bridge effective
5/15/2024**

Safety Risk Factor Determination

- The case manager leads the Interdisciplinary Team (IDT) in gathering and evaluating the evidence to determine whether a member meets the definition of Public Safety Risk Convicted, Public Safety Risk Not Convicted, or Extreme Safety Risk to Self.
- The regulatory requirements that guide the process are found in [10 CCR 2505-10 8.612.3.C.](#)

Risk Factor Types

- There are three Safety Risk Factors:
 - Public Safety Risk - Convicted
 - applies to both adult Developmental Disabilities (HCBS-DD) and Supported Living Services (HCBS-SLS) waivers
 - Public Safety Risk - Not Convicted
 - applies to HCBS-DD waiver Members only
 - Extreme Safety Risk to Self
 - applies to HCBS-DD waiver Members only

Definitions Related to Risk Factors

- **24/7 Line of Sight Supervision** in all environments means a continuous onsite supervision of the member during which support persons must be within hearing and visual distance of the member
- **Controlled Environment** i.e. locked/secured setting, window/door alarms, delayed egress, video/audio monitoring

Public Safety Risk - Convicted

- **Public Safety Risk - Convicted definition:** This factor shall be identified when a member has been found guilty through the criminal justice system for a criminal action involving harm to another person or arson and who continues to pose a current risk of repeating a similar serious action and the member has a **Rights Modification** in accordance with [Section 8.604.3](#) or through parole or probation, or a court order that imposes **Line of Sight Supervision** unless the member is in a **controlled environment** that limits their ability to engage in the behaviors that pose a risk or to leave the controlled environment unsupervised.

Public Safety Risk - Not Convicted

- **Public Safety Risk - Not Convicted definition:** This factor shall be identified when a member has not been found guilty through the criminal justice system, but who does pose a current and serious risk of committing actions involving harm to another person or arson and the member has a **Rights Modification** in accordance with [Section 8.604.3](#) or through parole or probation, or a court order that imposes **Line of Sight Supervision** unless the member is in a **controlled environment** that limits their ability to engage in the behaviors that pose a risk or to leave the controlled environment unsupervised.

Extreme Safety Risk to Self

- **Extreme Safety Risk to Self definition:** This factor shall be identified when a member displays self-destructiveness related to self-injury, suicide attempts, or other similar behaviors that seriously threaten the member's safety and the member has a **Rights Modification** in accordance with Section 8.604.3 or has a court order that imposes **Line of Sight Supervision** unless the member is in a **controlled environment** that limits the ability of the member to harm themselves.

Risk Factor Determination

- Risk Factor determination includes the requirement of Line of Sight Supervision and/or a controlled environment that limits the member's ability to engage in harmful behaviors.
- Line of Sight Supervision and/or a controlled environment, as applicable, must be clearly stipulated in the Rights Modification documentation that has been reviewed by the Human Rights Committee (HRC).
- **Additionally, allowing any unsupervised time, in any environment, without a controlled environment as outlined in the Rights Modification excludes the member from Risk Factor determination.**

Removing Risk Factors

- The member's Risk Factors must be reviewed as appropriate, annually at a minimum. Upon review, if it is determined that the member no longer meets the Risk Factor definition, the Bridge must be updated to reflect the change.
- For cases in which a member's behavior does not satisfy Risk Factor criteria or when because of a member's improvement, Risk Factors may potentially be removed but the member's needs continue to be substantially higher than those typical of their assigned Support Level, the IDT may consider a Risk Factor Transition Support Level Review (SLR) as a part of the support planning process as outlined in [10 CCR 2505-10 8.612.4](#).

Risk Factor Process

- “Risk Factor Determination: Process Flow” is the most current resource to walk through the specific requirements and prerequisites for a member to qualify for a Risk Factor.
- This can be found as an attachment to Informational Memo [IM 22-011](#)

Risk Factor Process in the Bridge

- Case managers will need to input Safety Risks into the Bridge for all HCBS-DD and HCBS-SLS member's records annually.
- Case managers will need to find the member in the Bridge under Main Menu > Client Search > Risk Tab.
- The “Review Date” field in the Bridge has been updated to “Effective Date” as of 5/15/2024.

Risk Factor Process in the Bridge

Public Safety Risk	Risk to Self Values	Effective Date	Last Updated Date
No, Does not meet definition	No, Does not meet definition	06/01/2017	06/05/2017
No, Does not meet definition	No, Does not meet definition	04/24/2018	04/26/2018
No, Does not meet definition	No, Does not meet definition	05/29/2019	06/03/2019
No, Does not meet definition	No, Does not meet definition	05/13/2020	05/14/2020
No, Does not meet definition	No, Does not meet definition	05/26/2021	07/31/2021
No, Does not meet definition	No, Does not meet definition	05/17/2022	07/06/2022
No, Does not meet definition	No, Does not meet definition	05/02/2023	05/03/2023

RISK

Public Safety Risk Risk to Self Effective Date

System Date

Risk Factor Process in the Bridge

- Case managers must assess a member's risk and document this annually in the Bridge "Risk Section" prior to submitting any DD or SLS Pre-Prior Authorization (PPA). If the member does not meet the definition for Risk Factors the case manager will select "No, does not meet definition" for the applicable category.
- The Risk "Effective Date" must:
 - Fall within the 90 days prior to (no greater than) the PPA Certification Start Date
OR
 - Fall between the PPA Certification Start Date and PPA Certification End Date
- The DD or SLS PPA cannot be submitted unless an appropriate Risk Effective Date is entered.

Risk Factor Effective Date

- A member's Risk Factor **Effective Date** will be the start date of the calculated change to the member's Support Level based on risk.
- This means that a member's Risk Factor could be identified based on when the Interdisciplinary Team completes the Risk Factor Review
- Or a case manager may also choose to identify the Risk Factor effective Date as the member's upcoming Certification Start Date.

Client Information Section in the Bridge

- **Algorithm Support Level (SL):** the SL that is produced through the SIS SL algorithm in the Bridge - the standard scores that come across from SIS Online and generate the base SL.
 - Algorithm Support Level sections include Home Living, Community Living, Health and Safety, Exceptional Medical, and Exceptional Behavioral
- **Calculated (Calc) Support Level (SL):** the Algorithm SL plus any Risk Factors and/or overrides that are currently in place.

Calculated Support Level in Bridge

MMIS PA Number [Redacted] Client ID [Redacted]

Bridge PPA Number [Redacted] Client Last Name [Redacted]

PA Status APPROVED Client First Name [Redacted]

Process Status ACCEPTED BY IC Client Birth Date [Redacted]

Amendment Status [Redacted] Support Level 1

Process Status Date 05/24/2023 Receive Alert NO

Selected Benefit Plan HCBS-Developmental Disabilities (DD) Cert Start Date 07/01/2023

Provider ID [Redacted] Cert End Date 06/30/2024

Current Benefit Plan BHAB 05/01/2023-12/31/2299

Claims Activity Authorized SPAL/CES Limit \$0.00

Total SPAL/CES Spend \$0.00

HCBS AVG Daily Cost \$0.00

LTHH AVG Daily Cost \$0.00

Total AVG Daily Cost \$0.00

Buttons: Sync, Check Limits, Submit PPA, Delete, Print

Line	Status	Service Description	Units	Dollars	Eff Date	End Date	ADL	IADL
01	APPROVED	T2021 - Level 1 - Tier I/II- Specialized Habilitation U3 HQ	624.000	\$2,090.40	07/01/2023	06/30/2024	Y	N
02	APPROVED	T2016 - HABIL RES WAIVER PER DIEM - INDIVIDUAL LEVEL 1 U3	365.000	\$29,064.95	07/01/2023	06/30/2024	Y	N
03	APPROVED	T2003 - MILEAGE BAND (0-10 MILES) U3	312.000	\$3,007.68	07/01/2023	06/30/2024	Y	N
04	APPROVED	T2019 - HABIL SUP EMPL WAIVER 15MIN U3 SC	48.000	\$744.48	07/01/2023	06/30/2024	Y	N

Support Level History

- The “Support Level History” tab can be located within the Client Information section in the Bridge which documents the history of Support Level changes for a member over time
- The Support Level may change if any of the following occur:
 - Member has a SIS Reassessment
 - Member’s Risk Assessment is updated by case manager
 - Member’s Override information is updated by HCPF (SLR, ESLR)



No	Effective Date	End Date	DD Day Level	DD Res Level	SLS Support Level	Override Reason	Level 7 Residential Rate
4	04/01/2022	12/31/2299	2		2		\$0.00
3	02/01/2022	03/31/2022	2		2		\$0.00
2	12/15/2021	01/31/2022	2		2		\$0.00
1	06/05/2008	12/14/2021	2		2		\$0.00

Support Levels in the Bridge

- The Support Level of the services on the HCBS-DD and HCBS-SLS Pre-Prior Authorizations (PPAs) must match the member's assigned Calculated Support Level in the Bridge.
- The dates of the Support Level specific services on the PPA line need to align with the dates of the member's Calculated Support Level.
- **After 5/15/24 a Support Level Mismatch Bridge System generated error check was implemented. HCBS-DD PPAs will no longer require supervisor review for PPA submission.**

Support Level Messages in the Bridge

- After 5/15/24 all HCBS-DD and HCBS-SLS PPAs will require the member's Calculated Support Level to match the Support Level of the services on the PPA.
- If services on the PPA do not align with the member's Calculated Support Level, the error messages below will appear when saving the PPA.

Message Description	Panel	Field	Row
 Selected service does not match client's Support Level.	Line Item		2
 Selected service date range does not match client's Support Level date range.	Line Item		2

Support Level Messages in the Bridge

- The Bridge will give a **B051 error code** if the member's risk review date does not align with the required annual review when the case manager hits “check limits” on the member's PPA.
- Remember, the Risk “Effective Date” must:
 - Fall within (no greater than) the 90 days prior to the PPA Certification Start Date

OR

 - Fall between the PPA Certification Start Date and PPA Certification End Date

Other Error Messages in the Bridge

- **B100 - Support Level Invalid** - A support-level-specific service tied to active claims does not match the client's support level and date range. Please request a supervisor to review and submit the PPA.
- **B101 - Support Level Invalid** - A support-level-specific service tied to active claims does not match the client's support level and date range. This PPA requires Department review.
- Claims may need to be backed out for the Line Item if these errors post on the PPA. The PPA can be submitted but requires supervisor or Department review and approval.

Support Level E in the Bridge

- For HCBS-SLS members with Support Level E, Line-Item Services must be labeled with the Support Level (1-6) that the member qualified for based on their SIS. Level E allows for a SLS member to get the maximum SPAL.
- These PPAs will continue to be submitted to the ltssocc@state.co.us
- Keep in mind that the total spend of all Home and Community Based Services for the plan year cannot exceed the current overall SLS Waiver cap.

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