



COLORADO
Department of Health Care
Policy & Financing

1570 Grant Street
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Service Plan Signature Page FAQ

Fact Sheet October 2020

I understand that the new signature page is a federal requirement, correct?

Yes, CMS requires that as part of our waiver agreement, the person-centered plan is agreed to, with the informed consent of the individual in writing, and signed by all individuals and providers responsible for its implementation.

If the Member has a guardian, we will continue to obtain the guardianship documents and have the guardian sign, correct?

Yes, if applicable. The legal guardian or other individual with the appropriate legal authority to sign and within the scope of their authority (which the case manager should confirm by reviewing the guardianship/other legal papers), shall do so. The case manager should also strive to obtain the member's signature as a person-centered practice.

If the Member has a Power of Attorney (POA) we will continue to obtain those documents as well, and should we have the POA sign?

Yes, if the member has a Medical Durable Power of Attorney, they should sign; other types of Power of Attorneys, acting within their scope of authority, should also sign when appropriate. Again, the case manager should confirm the legal authority of the POA to make this kind of decision by reviewing the POA/other legal papers and should also strive to obtain the member's signature as a person-centered practice.

Please refer to [HCBS Setting FAQ Part I](#) for more information on guardians or other legal representatives and their role as a decision-making authority.



If the guardian or POA are unable to sign the signature page right away would you prefer CMAs hold off on certifying the client?

If the guardian or POA with decision-making authority gives verbal consent and clearly intends to sign, the case manager should not delay the next steps of finalizing the plan.

Do Members and Guardians have to sign both on the line indicated for clients and/or Guardian and in the Plan Participants Section?

The Member and/or Guardian must only sign once, on their designated line.

Does the new signature page require all providers to sign it?

The requirement for provider signatures is limited to HCBS providers that are authorized through the CMA's PAR.

What does it mean to implement the plan? Isn't the case manager solely responsible for implementing the plan?

The federal rule differentiates between developing, monitoring and implementing. The case manager is responsible for developing and monitoring the plan, whereas service agencies are the providers responsible for implementing the plan and its authorized services.

For Members utilizing CDASS, should the FMS sign the signature page or the Member, who hires their attendants and plays the role of the employer?

The FMS provider isn't implementing the plan and, therefore, would not need to sign. It is the responsibility of the member/CDASS Authorized Representative to ensure the provision



of the authorized services they are approving their attendant to perform for payment; the member/CDASS Authorized Representative should sign the plan.

What about in IHSS? Who would sign?

The IHSS provider agency representative should sign the Service Plan.

Many members just have PERS providers that just send for units, who would sign for that?

The chosen PERS provider agency should sign the Service Plan.

Have the providers been made aware of this expectation?

The memo is posted to the website and the topic was covered at the All LTSS Providers webinar presented 9/25/20.

Will we be able to accept digital signatures from providers following the conclusion of the current public health emergency?

The Department is working on obtaining approval from CMS for digital signatures on an on-going basis.

With just the signature page being provided, is the expectation to mail a copy of the service plan to Members still in place?

The service plan, including signature page, must be distributed to the individual and all providers identified in the Service Plan.



For CSRs, are we able to enter a PAR and if we don't get the signature page back within 60 days then we proceed forward with a PAR and then close after the PHE is over?

Yes, currently you may enter the PAR without the signature page. The Department will provide guidance regarding how to proceed at the conclusion of the PHE.

I am assuming that for new intakes, we will not be able to create a PAR until all signatures are completed. I am concerned that if all parties have up to 60 days to return the forms this is a long time for members to wait for services (referring to new intakes).

If the case manager has obtained the member's signature, work to create a PAR may begin, once the provider is selected, they may begin providing services once they have signed and returned the signature page.

Can multiple signature pages be obtained for a single service plan for the same cert period or are we expected to get all signatures on one page?

Multiple signature pages are allowed, as some individuals may need to sign digitally and others by hand. If multiple pages are used, all pages should be maintained in the record.

Is the expectation that this also applies to Skilled Nursing Facilities and/or Hospice, PACE, HBU, LTHH, ICF/IID , HCA cases as well? If going from a hospital to a SNF, do we need both facilities to sign the SOA?

If someone is admitting to a Skilled Nursing Facility and/or Hospice, PACE, HBU, LTHH, ICF/IID, HCA, nothing in the process has changed. The requirement for provider signatures is



limited to HCBS providers that are authorized through the CMA's PAR. The signatures of the Member/MDPOA/Guardian in the first signature box are sufficient and there is not a need for a second signature in the "Plan Participants" box. Hospital staff do not need to sign the Service Plan document or the Statement of Agreement. Their signature on the ULTC referral page is sufficient.

What suggestions or supports can HCPF offer regarding getting multiple parties to sign the SOA electronically since we are not meeting face to face currently? We are currently using Adobe and just having the Member Fill & Sign, but we have been told that this is not very accessible and can be quite challenging for many that we serve and their families. Any suggestions would be appreciated.

People may type their name on the signature line if they struggle with or do not wish to go through the steps to do the Fill and Sign signature field. To obtain multiple signatures you may explore using Dropbox or Google Drive, which are free options on the internet that are available to everyone regardless of platform. [Here is an article](#) about these types of sites.

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