

Stakeholder Engagement for Day Program Services for HCBS Waivers - Adult Day Services

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COLORADO

Department of Health Care
Policy & Financing

Our Mission

Improving health care access and outcomes for the people we serve while demonstrating sound stewardship of financial resources



Purpose of Meeting:

- To engage stakeholders on Adult Day Services (ADS) changes in response to COVID-19
- To receive input, suggestions, and ideas for flexible service delivery of ADS, including Specialized ADS
- To receive feedback on proposed ADS regulation changes

Agenda

1. Review September 24th stakeholder meeting
2. Receive feedback on tiered ADS structure & implementation thus far
3. Discuss flexible service delivery options for Specialized ADS
4. Propose changes to ADS regulations
5. Receive feedback and suggestions for additional changes to regulations
6. Next Steps

September 24th Meeting

- Reviewed OM 20-091: Adult Day Services in Response to COVID-19 (previously OM 20-087)
- Clarified previously issued guidance
- Received feedback on tiered ADS structure & implementation thus far
- Discussed flexible service delivery options for Specialized ADS

Review of 3-Tier Structure

Tier 1: 15-minute unit of virtual or in-person ADS

- Up to 12 units or 3 hours a day
- Waives many of the requirements of a facility-based setting (lockers, showers, meals, etc.)

Tier 2: 1 Unit of in-person ADS

- Must meet all ADS requirements
- Can be combined with Tier 1 ADS

Tier 3: 2 units of in-person ADS = more than 5 hours

- Must meet all ADS requirements
- Cannot be combined with Tier 1 ADS

Feedback on 3-Tier Structure

- How has the 3-tier structure been working for providers and members thus far?
- Is up to 3 hours of Tier 1 ADS a day sufficient?
- Do members feel comfortable returning to in-person ADS yet?
- Do members utilize both Tier 1 & Tier 2 ADS in the same day?
- Are there additional modifications the Department should consider for Basic ADS?

Review of 2-Tier BI Structure

Tier 1: 15-minute unit of virtual or in-person ADS

- Up to 8 units or 2 hours a day
- Waives many of the requirements of a facility-based setting (lockers, showers, meals, etc.)

Tier 2: 1 unit of in-person BI ADS

- 1 unit = 2+ hours of service
- Must meet all BI ADS requirements
- Cannot be provided on same day as Tier 1

Feedback on 2-Tier Structure

- How has the 2-tier structure been working for providers and members thus far?
- Is up to 2 hours of Tier 1 ADS a day sufficient?
- Do members feel comfortable returning to in-person ADS yet?
- Are there additional modifications the Department should consider for BI ADS?

Specialized ADS

- May continue to be provided either in-person or using telehealth during the public health emergency (PHE)
- Not included in the 3-tiered ADS structure
- More intensive service with additional requirements beyond Basic ADS
 - Nursing services through telehealth is telemedicine
 - HCBS cannot reimburse for telemedicine
- Specialized ADS providers that would like to bill 15 minute units or wish to continue to provide telehealth options after the PHE, may bill Basic ADS Tier 1

Feedback on Specialized ADS

- Would Specialized ADS providers like to have the option to continue to provide telehealth services post-pandemic?
- What other issues or obstacles are you seeing as a provider?
- What impact does this approach have on the quality of service provided?
- What changes still need to be made to improve the service?

Proposed Regulation Changes - Basic ADS

Separate out Tier 1 vs Tier 2 & Tier 3 regulations

Completely Remove from Tier 1:

- Assistance with ADLs
 - Removed from telehealth ADS only
 - In-person Tier 1 would still have this requirement
- Medication administration
- Nutrition services
- Provider 'Environment' roles and responsibilities
- Provider 'Food Safety Requirements'

Proposed Regulation Changes - Basic ADS cont.

Still required or modified under Tier 1:

- Community integration & meaningful activities
- Social and recreational supportive services
- Participants' right to choose not to participate
- Medication monitoring - administration will be removed
- 'Records and Information' will now include virtual services
- 'Care Plan' will now include service delivery preference and preferred weekly schedule of virtual and in-person services



Proposed Regulation Changes - Basic ADS cont.

Still required or modified under Tier 1:

- Critical Incident Reporting
- Staffing requirements will be updated to include virtual services
- Training requirements will now include training on providing ADS through telehealth
- Written policies will include telehealth service-specific policies
- Reimbursement Method of ADS will be updated to include Tier 1 billing structure & limits

Proposed Regulation Changes - BI

Removing the following requirements under Tier 1:

- Certification standards of the center

Separating out requirements of Tier 1 & Tier 2:

- Updating staffing requirements to reflect Tier 1
- Updating policies based on Tier level
 - Example: Meals & nourishment that will be provided

Creating regulations for Tier 1:

- Virtual monitoring of clients to ensure hygiene is met, meds are being taken, nutrition is sufficient, etc.



Feedback on Proposed Changes

- Are there other requirements that should be modified based on the tiered structure?
- What protections for members should be added?
- What other changes should the Department consider for ADS, in general?
- Are there things that should be added to the regulations based on the new tiered structure?

Next Steps

- Submit additional questions, comments or feedback to HCPF_HCBS_Questions@state.co.us
- The Department is working on updating EBD, SCI, BI, and CMHS waivers to reflect this new billing structure
 - Draft regulation revisions will go out for Public Comment
- The Department will then update Adult Day Service regulations ([8.491](#)) & ([8.515.70](#))



Questions?



Contact Info

HCPF_HCBS_Questions@state.co.us



Thank you!



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