

# Stakeholder Engagement for Day Program Services for HCBS Waivers - Day Habilitation

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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 changes to Day Habilitation services in response to COVID-19 outlined in [Operational Memo 20-105](#)
- To answer questions and receive input and feedback on the modifications for flexible service delivery of Specialized Habilitation (SH) and Supported Community Connections (SCC)



# Agenda

1. Review recent stakeholder engagement process and issued memos
2. Review OM 20-105
3. Receive feedback on proposal and answer questions
4. Determine next steps

# Stakeholder Engagement

- Department hosted 3 stakeholder engagement opportunities to discuss Day Habilitation changes and requirement to remain budget neutral
- Proposed a 3-Tier Structure for SH & SCC services
- Operationalized tiers with an annual spending cap to allow members to mix & match services & tiers
  - OM 20-099
- Received feedback regarding the negative impact the annual spending cap would have on members
  - OM 20-100 rescinded OM 20-099



# Operational Memo 20-105

What does this memo state?

- Not operationalizing annual dollar cap
- Group SH & SCC services may be provided virtually or in-person, through the approval of Appendix K
  - Currently through March 9, 2021, however CMS has announced that states may now extend for 6 months after the end of the Public Health Emergency (PHE)
- Moving forward with Tier 3 - individualized, 1:1 service
- Members wishing to receive 1:1 SH and/or SCC may work with their case manager to add the service/s to their service plan
- Members adding the 1:1 service/s to their service plan must remain within the member's prior year's dollar utilization for SH & SCC services



# OM 20-105 cont.

- Utilization based on the prior years' paid claims
  - Not based on the units authorized
  - Pre-pandemic levels
- Members adding 1:1 services may utilize any combination of new services & existing services up to their prior year's dollar utilization
- Support Level 7 members receiving services will continue to receive services as usual & will not require the addition of a 1:1 option

# OM 20-105 cont.

- What if a member is new to the DD or SLS waivers and would like to add 1:1 Day Hab. services to their service plan?
  - New members would need to remain within the previous years' *average* dollar utilization of their Support Level
  - The Department will work with Case Managers to define these numbers



# Feedback on Newest Memo

- What issues or obstacles do you see for providers?
- What impact would this have on the quality of service provided?
- Does this provide enough flexibility for both providers and members?
- Would this have a negative impact on members?
  - Loss of services
- What questions or comments do you have?



# Supported Employment

- Prevocational & Supported Employment services are not being modified
- The Department realizes that some members have stopped working due to the risk of COVID-19 exposure & are no longer receiving Supported Employment
- Those members who wish to substitute Supported Employment with Day Hab. services may do so
- In these situations, a members' pre-pandemic utilization dollar amounts will include their Supported Employment utilization



# Billing Considerations

- Services provided virtually, should be billed for using the traditional rate structure by Support Level
  - Enter “Place of Service 02” on the claim when services are provided virtually
- Billing under 1:1 SH must use the new procedure codes & modifiers based on member’s waiver
  - \$5.36 for all Support Levels, per 15-minute unit
- Billing under 1:1 SCC must use the new procedure codes & modifiers based on member’s waiver
  - \$7.03 for all Support Levels, per 15-minute unit



# Case Management Changes

- Case managers should contact members to determine who would like to receive 1:1 services & revise their PAR accordingly
- If a member does not request or wish to add 1:1 services, **no revisions are necessary**
- The Department will be providing utilization reports to each CMA, to ensure that members stay within prior year's utilization
- Case manager then checks the report to ensure revisions do not exceed prior years' utilization



# Other Considerations

- Regardless if a revision occurs, members must continue to stay within the existing unit limitations for the DD and SLS Waivers
  - DD Annual Limits
    - Maximum of 4,800 combined units of SH, SCC & Prevocational Services
    - Maximum of 7,112 combined units of SH, SCC, Prevocational Services & Supported Employment
  - SLS Annual Limits
    - Maximum of 7,112 combined units of SH, SCC, Prevocational Services & Supported Employment

# Future Changes to Day Hab.

- When PHE ends, the Department will then implement all 3 tiers for SH & SCC
  - Tier 1 - virtual only - billed at lower, singular rate
  - Tier 2 - traditional Day Hab. Services - provided in a group setting, billed by Support Level
  - Tier 3 - 1:1, individual service - billed at higher, singular rate
    - Except for Support Level 7 (DD waiver only)
- The Department will evaluate removing the utilization cap on 1:1, individual services
- 1:1, individual rate will increase at end of Appendix K



# Next Steps

- Submit additional questions and feedback to [HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)
- The Department will update guidance, including incorporating all 3 tier service levels, for Day Habilitation Services once the Appendix K expires
- The Department will submit waiver amendments and update regulations to reflect changes



# Questions?





# Contact Info

[HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)



# Thank you!



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