

Supports Intensity Scale (SIS) Assessment and Support Level Rule Changes

Technical Assistance Call

Presented by: Care and Case Management
System Improvement Unit

May 2023

Introductions

- Lori Thompson - Care and Case Management System Improvement Unit Supervisor
- Mariah Kohlruss-Ecker - Assessment Quality Lead
- NaDean Smith - Entry Point and Case Management Program Assistant and SIS-A Contacts Liaison
- Kristie Blickman - Person-Centered Budget Algorithm Coordinator

Purpose

- Explain recent SIS Assessment and Support Level (SL) rule changes
- Discuss the Case Management Agency's (CMA) role in each of the rule changes
- Provide guidance to CMAs in implementing the new rules and processes
- Discuss new and updated standardized forms
- Answer questions from case management staff regarding the new or updated processes

Today's Agenda

- Discuss recent stakeholder engagement
- Distributing SIS Assessment and SL Results
- Provide annual overview of SIS Assessment
- Complaint process timeline for Members
- Algorithm Table update
- Risk Factor Transition Process
- SIS Reassessment Support Level Restoration Process
- Expedited Support Level Review (E-SLR) Process

Recent Stakeholder Engagement

- The Department convened a SIS/SL Workgroup and a SIS Assessor Community of Practice in June 2022 and met monthly until March 2023
- Discussed and reviewed concerns surrounding the SIS and SL algorithm
- Developed tools and strategies to address any areas of concern

Distributing SIS Assessment and Support Level (SL) Results

[10 CCR 2505-10 Section 8.612.1.F](#)

“The CMA shall inform the Member that they will receive a copy of the completed SIS assessment within 30 days of the SIS interview date. The CMA shall document provision of a copy of the SIS assessment to the Member, their guardian, or their legally authorized representative in the Department prescribed system.”

hcpf.colorado.gov/departments-program-rules-and-regulations

Distributing SIS Assessment and SL Results

- The CMA shall distribute a copy of the SIS Family Friendly Report to the Member/Guardian within 30 days of the SIS Interview date
- Use the Cover Letter PDF as a cover sheet with the SL results drop down
- Document in a log note the date that the SIS Assessment Family Friendly Report and cover letter were sent to the Member/Guardian

Supports Intensity Scale Assessment Report Cover Letter

A Supports Intensity Scale (SIS) Assessment Interview was conducted for:

Member Name:	Date of Assessment:
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Attached to this cover letter is the SIS Assessment and the responses to the assessment questions. Below you will find the final SIS Support Level Result.

The Support Level is a number determined by an algorithm that places members into groups with other members who have similar overall support needs. The Support Level is used to determine which standardized rates will be reimbursed to the provider for Residential and Day Services, in the HCBS-Developmental Disabilities (DD) waiver. The Support Level is used to determine Day Services rates paid to the provider and the overall budget in the Service Plan Authorization Limit (SPAL) in the HCBS-Supported Living Services (SLS) waiver.

Final Support Level Result:	Support Level Effective Date:
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If you have any questions or concerns about your SIS results and determined Support Level, you can call or email your case manager. Your case manager can tell you about the process to request a new SIS Assessment, a Support Level Review, or how to otherwise dispute the results.

Case Manager Name:	
Phone:	Email:

Case Manager Name, phone number, and email address

Final Support Level Result - is a dropdown menu with the following options 1, 2, 3, 4, 5, 6, and Pending county notification



Support Level Effective Date - date of SIS Assessment or SIS Reassessment (use this date for PAR revisions too)



Potential Barriers

- Not yet received county notification/financial eligibility or does not have a Bridge/Care and Case Management (CCM) system record
 - Send SIS Family Friendly Report with Cover Letter and mark “Pending county notification”
- Member is 17 years old
 - Send SIS Family Friendly Report with Cover Letter and mark “Pending county notification”
 - Run manual calculation sheet for SL
- SIS Online and Bridge/CCM have not connected
 - Check SIS Online matches Bridge/CCM system demographic info (date of birth, SSN, Medicaid ID, and Full *legal* name)
 - Email HCPF SIS Inbox for further assistance sis_sl@state.co.us



Questions about Distributing the SIS?



Provide Overview of SIS Assessment Results

[10 CCR 2505-10 Section 8.612.1.F](#)

“The CMA case manager will provide an overview of the results of the most recent SIS assessment during the initial or continued stay review (CSR) person-centered support planning process. This overview shall include discussion of: the Exceptional Medical and/or Behavioral Support Needs identified in Section 1 of the SIS assessment, the areas of priority support needs identified in Section 2 of the SIS assessment, the resulting Support Level, and the services necessary to meet these priority areas.

If, upon review of the results of the SIS assessment at the initial or CSR planning meeting, there is a significant change in the Member’s condition or circumstances, they should refer to the SIS reassessment process or the Support Level Review process.”

Provide annual overview of SIS Assessment

- CMA case manager shall provide overview of SIS assessment and SL results at the initial and continued stay review Person-Centered Service Plan meetings
- Case manager shall use the “CMA Overview Guide for SIS & SL Results” and “[AAIDD Respondent Handbook](#)”
- Review for **significant discrepancies** and/or **major changes** in the Member’s support needs
- Determine with Member/Guardian and IDT if a SIS Reassessment request or Support Level Review request is needed.

CMA Review Guide for

Supports Intensity Scale Assessment and Support Level Results

10 C.C.R. 2505-10 Section 8.612.1 Supports Intensity Scale (SIS) Assessment:

The Case Management Agency (CMA) shall inform the Member, their legal guardian, or their legally authorized representative of the purpose of the SIS, the SIS Complaint Process, and the Support Level Review Process.

The CMA shall document that this information was provided and received on the SIS and Support Level Disclosure Document.

The CMA shall inform the Member that they will receive a copy of the completed SIS assessment within 30 days of the SIS interview date.

The CMA shall document provision of a copy of the SIS assessment to the Member, their guardian, or their legally authorized representative in the Department prescribed system.

Section 8.612.1.F.1: The CMA case manager will provide an overview of the results of the most recent SIS assessment during the initial or continued stay review (CSR) person-centered support planning process. This overview shall include discussion of:

- 1. The Exceptional Medical and/or Behavioral Support Needs identified in Section 1 of the SIS assessment**
 - a. The case manager reviews this section's justification notes and verifies that supports are in place to meet these needs.
- 2. The areas of priority support needs identified in Section 2 of the SIS assessment**
 - a. The case manager briefly reviews the life domain sections and if there are any significant support needs or personal goal areas that need to be addressed in the Person-Centered Support Plan.
- 3. The resulting Support Level (SL)**
 - a. The case manager shares the current Support Level (SL) and how it relates to provider service rates for Members on the HCBS-Developmental Disabilities (DD) and HCBS-Supported Living Services (SLS) waivers as well as the Service Plan Authorization Limits (SPAL) for Members on the HCBS-SLS waiver.
- 4. Any Risk Factors and overrides that are currently in place in the Department prescribed system**
 - a. The case manager must discuss any Support Level Reviews (SLRs) currently in place and the impact of the SLR and/or Risk Factors overrides to the SL and relevant services

and rates to providers

5. The services necessary to meet these priority areas.

- a. The case manager should consider the results of all relevant assessments including the ULTC 100.2, the SIS Assessment, and any other needs assessments (i.e. the IRSS Health and Safety Assessment).
- b. The case manager will document this overview in the relevant service planning log note in the Department prescribed system.

Section 8.612.1.F.2: If, upon review of the results of the SIS assessment and the Support Level, there is a significant change in the Member's condition or circumstances, they should refer to the SIS Reassessment Request process or Support Level Review Request process. The CMA shall assist the Member through either of these processes.

*The Member may request initiation of either of these processes to their CMA. The CMA is required to submit the request to the Department, on behalf of the Member.



- Use areas 1-5 outlined in this document to help guide your conversation with the Member/Guardian/IDT.
- This conversation will help ensure that the current SL is reflecting the Member's current support needs.
- If there has been *significant* change to the Member's condition or circumstances, or the current SL does not reflect the needs, please determine if a SIS Reassessment or Support Level Review (SLR) is needed and proceed with the steps for that process.



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Policy & Financing

Provide annual overview of SIS Assessment

- The case manager will document that this overview was provided to the Member in the relevant service planning log note in the Department prescribed system
 - **Include a summary of overview in service plan log note**
 - Example of Overview Summary: Today I, Case Manager Mariah Kohlruss-Ecker, met with Member John Doe and his team including Mother/guardian Jane Doe and providers Mickey Mouse (Program Coordinator) and Donald Duck (Direct Care Provider) from Disneyland LLC. We review John's most recent SIS Assessment completed on 01/01/2010. We went over each Medical and Behavioral item scored in Section 1 and made sure that the scores and justification notes matched John's current support needs. We then reviewed the highest priority needs in Section 2 including meal preparation, laundry, and house cleaning/keeping. We determined that the needs around laundry were not entirely being met and the team decided to increase the enhanced homemaker hours to include laundering support for John on a weekly basis. There are no overrides or Risk Factors for John in the system and the overall SL 2 is currently meeting John's overall support needs. There is no need for a Support Level Review or SIS Reassessment at this time.
 - In the future, with the Phase 2 CCM system implementation the Department is working on a check box attestation



Questions about Reviewing the SIS with the Member?



Other SIS/SL Rule Changes

- Extended complaint process timeframe for Members from 15 business days to 30 calendar days
 - Complaints can only be filed by Member/Guardian
 - Only the Member/Guardian has a right to the SIS Assessment results. CMAs should not distribute the Family Friendly Report to any other parties
- Algorithm Table update
 - Better articulated the SL algorithm table in rule with specific thresholds creating floors and ceilings for each SL

Risk Factor Transition Process

10 CCR 2505-10 Section 8.612.3.D

“For cases in which a Member’s behavior does not satisfy a Safety Risk Factor definition but the Member’s needs continue to be substantially higher than those typical of their assigned Support Level (without adjustments for risk factors) and a Rights Modification continues to be in place, the IDT may consider a Support Level Review (SLR) request as a part of the person-centered support planning and Rights Modification process. If the IDT determines a SLR request is needed, the CMA shall submit a SLR request which includes, but is not limited to, detailed information from the PCSP describing the extensive supports needed and the Rights Modification(s), to include all requirements outlined in Section [8.508.102](#) and Section [8.484.5](#).”

Risk Factor Transition Process

- When a Member no longer meets the **specific stringent definition** for a Safety Risk Factor (Extreme Risk to Self or Public Safety Risk), but their needs continue to be substantially higher than those typical of their algorithm SL and a Rights Modification continues to be in place, the IDT may consider a Support Level Review (SLR) request
- Member's were experiencing an unnecessary "cliff" when they were ready to transition away from a Risk Factor - this makes it so teams can assist the Member in a slower, more gradual or structured transition to more independence

Definitions Related to Risk Factors

- **Extreme Safety Risk to Self:** This factor shall be identified when a client displays self-destructiveness related to self-injury, suicide attempts or other similar behaviors that seriously threaten the client's safety and has a rights suspension 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 client to harm themselves.
 - 24/7 line of sight supervision in all environments - Continuous onsite supervision of the participant during which support persons must be within hearing and visual distance of the participant
 - Controlled Environment (i.e. locked/secured setting, window/door alarms, delayed egress, video/audio monitoring)

Definitions related to Risk Factors

- **Public Safety Risk-Convicted:** This factor shall be identified when a Client 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** has a rights suspension in accordance with Section [8.604.3](#) or through parole or probation, or a court order that imposes **line of sight supervision** unless the Client is in a **controlled environment** that limits his or her ability to engage in the behaviors that pose a risk or to leave the controlled environment unsupervised.
- **Public Safety Risk-Not convicted:** This factor shall be identified when a Client 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** has a rights suspension in accordance with Section [8.604.3](#) or through parole or probation, or a court order that imposes **line of sight supervision** unless the Client is in a **controlled environment** that limits his or her ability to engage in the behaviors that pose a risk or to leave the controlled environment unsupervised.

Risk Factor Transition SLR Request

If the IDT determines a SLR request is needed, please fill out updated SLR Request form (May 2023) with the following information:

- A. Detailed information from the Person-Centered Support Plan describing the extensive supports needed and the Rights Modification(s)
- B. The plan included in the Rights Modification in order to restore the Member's rights in a comprehensive and structured transitional manner, sometimes referred to as a "fading plan" or "right's restoration plan"
- C. The steps taken in the plan and any progress that has been made to date
- D. The extensive supports and supervision levels that are needed to maintain the Member's and/or community's safety
- E. If a Right Modification includes a controlled environment (i.e. locked/secured setting, window/door alarms, delayed egress, video/audio monitoring), describe how these are being or have been reduced to lesser restrictive methods or discontinued
- F. The Support Level necessary to meet the Member's needs during this transition period

*New SLR Request Form desk guide coming soon.

Updated SLR Request Form



Support Level Review Request Form

Clear Form

Member Information			
Last Name:	First Name:	M.I.:	
Medicaid ID#:	SSN:	Date of Birth:	
Mailing Address:			
Date of most recent SIS Assessment:			
Risk Factors Impacting Support Level (check all that apply): <input type="checkbox"/> Extreme Safety Risk to Self <input type="checkbox"/> Public Safety Risk: Convicted <input type="checkbox"/> Public Safety Risk: Non-Convicted <input type="checkbox"/> Risk Factor Transition <input type="checkbox"/> No Risk Factors			
Calculated Support Level:	Current Support Level:	Requested Support Level:	Review Type: Select One
Support Level 7 Budget Sheet Completed by Provider(s) and Included with Request: <input type="checkbox"/> Yes			Select One Initial Re-Examination Risk Factor Transition
Residential Services and Supports Information			

Added Risk Factor Transition

Updated SLR Request Form

6. For Risk Factor Transition/Step-Down ONLY
Describe the plan included in the Rights Modification to restore the Member's rights in a comprehensive and structured transitional manner, sometimes referred to as a "fading plan" or "right's restoration plan."
Describe in detail the steps taken in the plan and any progress that has been made to date:
Describe in detail the extensive supports and supervision levels that are needed to maintain the Member's and/or community's safety:
Does the Right Modification include a controlled environment? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, select all that apply: <input type="checkbox"/> locked/secured setting <input type="checkbox"/> window/door alarms <input type="checkbox"/> delayed egress <input type="checkbox"/> video/audio monitoring <input type="checkbox"/> Other: (please specify) _____

Updated Section 6 for Risk Factor Transition/Step-Down Only

Describe in detail how controlled environment right modification(s) are being or have been reduced to lesser restrictive methods or discontinued:
Describe in detail the Support Level necessary to meet the Member's needs during this transition period:

Risk Factor Transition SLR Request

- The Department shall review the SLR Request with the standard SLR Request review process via the CMA SIS Contact and the SLR Review Panel
- The Rights Modification transition plan, and the associated Support Level, must be **reviewed by the IDT every six months** and the CMA must document the outcome in the Member's record log notes
 - **Log note should include: summary of discussion, any action items, and the overall plan until next review**
- The case manager will also need to update the related Rights Modification Section in the BUS or the Rights Modification Section PDF (CCM)
 - Since the Right Modifications Section from the BUS will be migrated **after** the CCM goes live, case managers will utilize a fillable PDF form provided by HCPF for any **new** Rights Modifications or **changes** to existing Rights Modifications and upload the form to the CCM record
 - This form is currently being developed and will be uploaded to the [LTSS Case Management Tools](#) website

Risk Factor Transition SLR Request

- When a Member's rights are restored **prior** to the end date of the SLR approval period, please notify the Department by emailing the SIS/SL Inbox at sis_sl@state.co.us and the Department will override the Support Level (SL) in the system
- The Department will notify the CMA of any final SL changes and the effective date
- The CMA shall make any necessary PCSP and PAR revisions resulting from the SL changes within ten (10) business days of the affected SL change
- The CMA must notify the Member of any Support Level changes



Questions about the Risk Factor Transition Process?

SIS Reassessment Support Level Restoration Process

- Over the years there has been an increase in volume of Reassessments. The ratio of Reassessments to initials is much higher for Reassessments, due to the sheer number of IDD Waiver enrollees and the 17 years that has elapsed since SIS implementation.
- Since the 2007 implementation of the SIS, there has been an expectation of increased justification of Section 1A/1B scores.
- With increased training and clarification from AAIDD, SIS interviewers are more consistently interpreting the rating key.

SIS Reassessment Request

- CMAs should exercise restraint with submitting SIS Reassessment requests. Only submit when **significant changes** (anticipated to be an ongoing need) have occurred for Members.

Applicable Significant Changes for SIS Reassessment	Not Applicable Significant Changes for SIS Reassessment
<ul style="list-style-type: none"> • Significant changes in Medical and Behavioral support needs • Significant overall increase to support needs in Home Living, Community Living, and Health and Safety • Changes need to be stable and ongoing, team has identified the support that is needed • New Medical diagnosis or Behavioral concern that affect other areas of support need or have far reaching effects 	<ul style="list-style-type: none"> • One or two scores increasing in the Medical and Behavioral sections → SL may not increase with minor score increases • A few scores increasing in a single domain (i.e. Home Living) → overall SL will not increase due to standard scores • New Medical diagnosis or Behavioral need identified, but other Med/Beh support needs have decreased or no longer exist → overall SL will decrease • A brand new support need identified that the team is still identifying the supports for (“what if” scenarios) • Changes in the Lifelong Learning, Employment, Social, or Protection/Advocacy domains

SIS Reassessment Support Level Restoration Process

- If a SIS Reassessment results in a Support Level decrease, the Department will restore the previous higher Support Level.
 - CMAs will **NOT** communicate the decreased Support Level to the member.
- This means the Member will have no decrease in services (SLS Waiver Service Plan Authorization Limit-SPAL) or provider rate reimbursement (SLS and DD Waiver).
- The Department will pull a data report at the end of each month for the previous month. The Department will retroactively restore the previous Support Level to the date of the SIS Reassessment.
 - Please enter SIS Assessments ASAP so we can get the most accurate reports.
- A decision letters will be sent to CMA SIS contacts within 5-10 business days after data report. CMA SIS contact- please follow-up and notify the SIS inbox if the Bridge override has not been updated within 60 days of the latest SIS Reassessment.
- The Department began this process January 1, 2023.

Sample SIS Reassessment SL Restoration letter

4/4/2023

Dear John Doe:

The Department has been made aware that when John Doe had a SIS Re-Assessment based on a request submitted by Developmental Pathways, this Re-Assessment conducted on 4/1/2023 resulted in a decreased Support Level from Level 4 to Level 3.

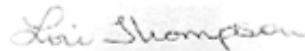
The Department has reviewed the SIS Online data from past SIS information, along with the reason stated for the request for a Re-Assessment. Because the intent of a Re-Assessment is to reflect current support needs and is certainly not to decrease the Support Level for a Member.

The Department has restored the Support Level to 4, via an override in the Bridge. The approved restored HCBS-SLS Support Level 4 is effective 3/1/2023 through 12/31/2299 (open-ended).

If there is a need for a Support Level increase, based on documented evidence of specific additional services or supports required, the CMA shall submit an SLR Request, as part of the established Support Level Review process. Additionally, if Risk Values are recalculated in the Bridge, please notify the Department immediately so that the override can be adjusted, if needed.

CMA please be sure to forward this decision to the appropriate individual/family members. Any questions regarding this decision may be submitted to hcpf_hcbs_casemanagement@state.co.us.

Sincerely,



Effective date = SIS Interview date
 End date = 12/31/2299 open-ended
 *There should be no gaps in SL history

Please also note this decision is to be passed along to individual/family members by the CMA.

If a future Risk Factor gets put into place, please notify the Department ASAP - Override trumps everything else so it will need to be adjusted.





Questions about the SL Restoration Process?

Expedited Support Level Review (E-SLR) Process

- The Department worked with a small ad hoc SIS/Support Level Workgroup to identify and address SIS assessment concerns
 - 2015 - AAIDD added 3 Exceptional Medical items to the SIS assessment
 - 2017 - Launch of the Interchange System, and SIS Online to Bridge interface, the Department made a policy decision to roll-up the Exceptional Medical Support scores into one (Other) category, without changing the algorithm
- HSRI and HCPF quantitative data analysis findings
 - 2017 - 2022 approximately 100 people affected
 - For approximately 2-3% of the Members receiving a SIS Assessment, a SL increase *may* be warranted

Expedited Support Level Review (E-SLR) Process

- **Department Led E-SLR Process**

- Equitable and transparent, majority of the work is completed by the Department
- **Specific (standard) calculation used** (Hypertension, Allergies, Diabetes, and Other #16-19)
- **Department staff will contact the CMAs directly if we identify a Member who may be eligible to receive a Support Level increase**

- **Case Management Tasks**

- Department will send **electronic** Decision Letter to CMA for the case manager to forward to the member/guardian, per their preference for communication
 - Complete standard service authorization revision process
 - Effective Dates in the Letter
 - Historical Years - Batch start date , beginning of the month(s)
 - Monthly ongoing process - Monthly report pulled 25th of following month, SIS assessment date effective date for SL increase

DATE

Member Name

Member Address

Dear Member Name:

This letter is to inform you that, as a result of the Department's Expedited Support Level Review Process, your current Support Level of # was increased to a new Support Level of #. Your Case Management Agency was notified of this Support Level increase and was directed to complete their standard service authorization revision process to reflect this change.

The approved HCBS-DD Support Level # is effective DATE through DATE.

Expedited Support Level Review Process Information

In recent months, the Department has been working with a small ad hoc SIS/Support Level Workgroup to identify and address concerns associated with the SIS Assessment administration and the Support Level Algorithm.

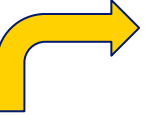
One of the areas we have discussed is related to a policy decision the Department made in 2017 around the SIS Online & Interchange/Bridge interface IT systems. See background information about this decision outlined below.

As a result, the Department felt it was important to establish a new process that is similar to the existing Support Level Review (SLR) process, but instead of having the Case Management Agencies (CMAs) request a SLR from the SLR Panel, the Department is owning the E-SLR process and will contact the CMAs directly if we identify a Member who may be eligible to receive a Support Level increase based on the below background information related to the SIS assessment and algorithm.

Background:

In 2016, AAIDD made changes to the SIS including renaming the assessment the "SIS-A" ("A" for Adults) and adding three medical conditions to the section of the SIS-A that measures Exceptional Medical Support Needs. The medical conditions added were Hypertension, Allergies, and Diabetes. These specific conditions were added because they were the most common written-in responses to the "Other" item in the medical section.

Previous and New SL



Important: Case manager will use these dates and SL # for revision

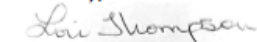
People who received the SIS-A had the chance to score up to 6 more points (2 for each of the 3 new items) than other people who had taken the classic SIS who may have had the same needs. This would make the algorithm unfair if people with similar needs could be assigned different Support Levels just because of the version of the SIS that they received.

To make the scoring and the Support Level Algorithm remain fair, HSRI (the original developer of the SIS/SL Algorithm) recommended a "roll-up" of the new items into one score under the "Other" item. The Department implemented this approach in 2017. The roll-up solution makes the scoring of the medical section on the SIS-A the same as the scoring they would have received in the medical section of the classic SIS.

The HSRI data analysis looked at what the impact might be if these scores were unrolled; if the additional medical conditions were rated separately and added to the Exceptional Medical Support Needs raw scores sum. Between the HSRI quantitative data analysis and ongoing data reviews conducted by the Department (spanning from 2017 - current), for approximately 2-3% of the Members receiving a SIS Assessment, a SL increase *may* be warranted.

This is the policy decision and process that impacts you/your family Member's SL increase. Any questions regarding this decision may be submitted to hcpf_hcbs_casemanagement@state.co.us.

Sincerely,



Lori Thompson
 SIS Trainer & Quality Lead
 CCM System Improvement Unit Supervisor
 Department of Health Care Policy and Financing
 Office of Community Living

cc: Case Management Agency (Name)



CMA Name



Any
Questions?



Resources

LTSS Case Management Tools

- SIS Documents, Respondent Resources, links to AAIDD, SLR and Reassessment request forms, and more

2023 Memos

- Operational Memo coming soon
- Office of Community Living Bi-Weekly Newsletter
 - Sign up if needed
- Case Management inbox email
- Case Manager's Corner newsletter

Contact Info

Support Level Review,
SIS Reassessment Request Form Submission,
updated SIS Reassessment outcomes, Decreased
SIS Reassessments:
sis_sl@state.co.us

Support Level Review and SIS Reassessment
Request Questions or Concerns:
hcpf_hcbs_casemanagement@state.co.us

Thank you!