



Colorado
Cross-Disability
Coalition

Nothing about us, without us.

Colorado Cross Disability Coalition Medicaid HCBS Rates Review Comments – CDASS March 2017

What it is:

Consumer Directed Services and Supports (CDASS) is not a service, it is a service delivery option that is critical to thousands of Coloradans with long-term care needs. CDASS is one of three service delivery options for *personal care*, *homemaker*, and *health maintenance* services. The other two delivery options are agency based.

The CDASS service delivery option matters because:

- It gives clients control over the services they rely on daily, with limited risk
- It is the only option in rural portions of the state underserved by agencies
- It allows clients to pay family members for services
- It gives clients control of hiring, training, firing, and setting wages of attendants
- It is typically able to meet the needs of Medicaid clients who are described as too difficult for agencies to serve due to location, ventilator care, behaviors, etc
- *Personal Care* and *homemaker* services in CDASS are exactly the same as agency *Personal Care* and *Homemaker* services
- The CDASS *Health Maintenance* service is similar to agency *Certified Nurse Assistant skilled care*, however the Nurse Practice Act is waived for CDASS
- Clients can only use their allocation to pay for direct services through a Financial Management Service (FMS) agency
- Clients cannot use any portion of their allocations to hire lobbyists
- CDASS clients spend their own time and money on advertising, training, scheduling, and billing for attendants. Because clients are responsible for these functions, and the overhead in CDASS is only about 25%, CDASS clients can pay attendants decent wages.

Current Rate Details:

- CDASS allocations are based on assessed client needs by Single Entry Point case managers determining units of need multiplied by the current rate for that service
- The CDASS *Health Maintenance* rate are based on agencies skilled care rates, but reduced slightly because CDASS waives the Nurse Practice Act
- CDASS *Homemaker* and *Personal Care* rates were identical to the rates for agencies for these same services until 2015. The Home Health Agency lobbyists got a rate increase for agencies only, intentionally excluding CDASS.
- CDASS rates get reduced by 10.75% from the stated rate, HCPF uses this to pay for program administration, FMS services, and client and case manager training
- CDASS clients also pay "employer side" taxes, these are approximately 14%

Rate recommendations:

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- Keep the CDASS *Health Maintenance* rate at the current level
- Immediately re-align *Personal Care* and *Homemaker* rates between agencies and CDASS
- Increase the *Personal Care* and *Homemaker* rates by 10% each year between 2017 and 2020 to keep up with the rising minimum wage, this would move the rate from the \$17.00/hour agencies currently get to \$24.89/hour in 2020.