



<b>TITLE:</b>	<b>CHANGES TO BENEFITS AND SERVICES IN RESPONSE TO COVID-19</b>
<b>SUPERSEDES NUMBER:</b>	N/A
<b>EFFECTIVE DATE:</b>	<b>MARCH 24, 2020</b>
<b>DIVISION AND OFFICE:</b>	<b>BENEFITS AND SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING</b>
<b>PROGRAM AREA:</b>	<b>CASE MANAGEMENT AND PROVIDER AGENCIES</b>
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<b>OPERATIONAL MEMO NUMBER: HCPF O 20-024</b>	
<b>ISSUE DATE: MARCH 24, 2020</b>	
<b>APPROVED BY: BONNIE SILVA</b>	

## OPERATIONAL MEMO

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*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

### **Purpose and Audience:**

The purpose of this Operational Memo is to inform Providers and Case Management Agencies of temporary changes in response to COVID-19 pandemic to Home and Community-Based Services (HCBS) waiver benefits and services offered through Health First Colorado.

The Department of Health Care Policy & Financing (the Department) is requiring all HCBS waiver providers to modify operations in response to health concerns related to the COVID-19 pandemic.

Providers shall modify their operations to follow the most recent guidance from the [Centers for Disease Control \(CDC\)](#), the [Colorado Department of Public Health and Environment \(CDPHE\)](#) and the [President's Coronavirus Guidelines for America](#).

**Information:**

The Department is working with the federal Centers for Medicare & Medicaid Services to make temporary changes to selected State General Fund and Home and Community-Based Services programs to better ensure continuity of services and to mitigate the public health risk in response to the COVID-19 illness. In order to prevent the spread of COVID-19, the Department is implementing temporary provisions to prohibit services from being provided in group settings and allow for flexibility in the delivery of services.

Below is information on the services modified, the temporary allowable provisions, and the action needed from case management agencies and providers. Temporary modifications include but are not limited to virtual visits and alternative service locations.

At no time shall the delivery of community-based services include more than ten people, to include support staff. At all times, support staff shall ensure social distancing recommendations of at least 6 feet are followed. Services shall be provided via use of technology or in 1:1 settings wherever possible.

Prior to providing in person services, providers should conduct limited health screening of members and staff. Screening should include taking a member's temperature. Any reading 100 degrees or higher should be considered a failed screen and the member should contact their physician for further guidance.

If a staff or member are coughing or otherwise visibly ill, they should be separated from others and have a mask put on, prior to seeking medical attention.

Providers are encouraged to monitor the [CDC website](#) for information and resources and contact their [local health department](#) when needed. The Centers for Medicare & Medicaid Services (CMS) has issued guidance on infection control and prevention for Home Health entities. The Department requires all providers to follow this guidance. The formal guidance can be found on CMS' website [here](#).

Questions regarding this guidance can be sent to [HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)



**Home and Community-Based Service Waiver and State Plan Benefits Temporary Changes  
Effective March 24, 2020**

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Alternative Care Facility (ACF)</b>	ACF providers may modify visitor policies to home/ facility, modify community outings in alignment with published guidance on mitigating the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
<b>Acupuncture</b>	No modifications needed currently, as service provision allows for flexibility in place of service. If congregate settings are being used for service provision to groups, the Department requires changes to provide service in alternate settings.	No Changes Required	No Changes Required
<b>Adaptive Therapeutic Recreational Equipment and Fees</b>	Adaptive and Therapeutic Recreational Equipment providers may utilize telephone or video conferencing or phone assessments for recommended items. The preferred method being live video sharing.	No Changes Required	Providers must document when telephone or video conferencing assessments are conducted.

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Adult Day Centers</b>	<p>Adult Day Services may be provided in alternative locations, such as a member's home. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.</p> <p>Adult Day Centers that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p>	<p>The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan. Adult Day will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</p>	<p>Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at:</p> <p><a href="#">HCPF IM 20-017</a></p>
<b>Assistive Technology</b>	<p>Assistive Technology providers may utilize telephone or video conferencing or phone assessments for recommended items. The preferred method being live video sharing.</p>	<p>No Changes Required</p>	<p>Providers must document when telephone or video conferencing assessments are conducted.</p>

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Behavioral Management and Education</b>	Behavioral Management and Education providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether service integrity is maintained through a telephone or video conferencing delivery option and would be appropriate.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Behavioral Therapies - Counseling/ Consultation/ Assessment</b>	Behavioral Therapies-Counseling/ Consultation/ Assessment providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Behavioral Therapies - Line Staff</b>	Behavioral Therapies-Line Staff providers may utilize telephone or video conferencing methods when rendering this service. The service provision alternative includes allowance of services via telephone or video conferencing when appropriate, when hand over hand implementation of behavior interventions is not required. The behavioral plan consultant must indicate in the members care plan that a telephone or video conferencing visit will align with positive therapeutic outcomes and treatment goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Bereavement Counseling</b>	Bereavement Counseling providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member's family must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Chiropractic</b>	No modifications needed currently, as service provision allows for flexibility in place of service.	No Changes Required	
<b>CHRP Residential</b>	CHRP residential providers may modify visitor policies to home/ facility, modify community outings. Agencies and facilities must be in contact with the Colorado Department of Human Services, Division of Child Welfare Licensing to review modifications to services or programming that restricts the rights of children or that may result in non-compliance.	No Changes Required	Providers must communicate all changes in policies or restrictions on rights to residents and their guardians, if applicable, and document those changes and/or restrictions in the care plan. Providers must inform case managers of care plan changes.
<b>CHRP Wraparound - Intensive Support Services</b>	Wraparound-Intensive Support Services providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	therapeutic outcomes and treatment goals while maintaining service integrity.		
<b>CHRP Wraparound - Transition Support Services</b>	Wraparound-Transition Support Services providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Community Connector</b>	Community Connector may be provided in the home with minimal community integration; legally responsible persons are allowed to provide this service. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.	No Changes Required	Providers must document in the member's care plan any changes in service scope, method of delivery, or authorized direct care professional.
<b>Consumer Directed Attendant</b>	FMS Vendors have adjusted their hours to have someone available 7 days a week. The FMS' are ready to assist	No Changes Required	Members will need to ensure appropriate documentation for any changes.



<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Support Services (CDASS)</b>	members with questions and will work to enroll new attendants within 24 hours should a member have an urgent need for a new attendant.		
<b>Day Treatment</b>	<p>Day Treatment may be provided in alternative locations, such as a member’s home. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.</p> <p>Day Treatment providers that have closed, suspended or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p>	The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan. Day Treatment will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.	Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at:  <a href="#">HCPF IM 20-017</a>

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Dental</b>	No modifications appropriate/safe for this service.	No Changes Required	
<b>Expressive Therapy</b>	Expressive Therapy providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether service integrity is maintained through telephone or video conferencing delivery and would align with positive therapeutic outcomes and treatment goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Group Residential Services and Supports (GRSS)</b>	GRSS providers may modify visitor policies to home/ facility, modify community outings in alignment with published guidance on mitigating the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
<b>Hippotherapy</b>	There are no service modifications for this service delivery.	No Changes Required	
<b>Home Delivered Meals</b>	No modifications for this service.	No Changes Required	

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Home Modification and Adaptations</b>	Home Modification and Adaptions providers may utilize telephone or video conferencing technology for professional evaluations, if the client has live video sharing capabilities with the professional.	No Changes Required	Providers must document when telephone or video conferencing assessments are conducted.
<b>Homemaker</b>	No modifications for this service.	No Changes Required	
<b>In-Home Support Services (IHSS)</b>	No modifications for this service delivery option.	No Changes Required	
<b>Independent Living Skills Training (ILST)</b>	ILST providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative would allow the provider to use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and aligned with the member's goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Individual Residential Services and</b>	IRSS providers may modify visitor policies to home/ facility, modify community outings, in	No Changes Required	Providers must inform members and their families

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Supports (IRSS)</b>	alignment with published guidance on how to mitigate the spread of COVID-19.		or authorized representatives (where applicable)
<b>Life Skills Training (LST)</b>	LST providers may utilize telephone or video conferencing or video conferencing methods when rendering this service. The provision alternative would allow the provider to use their best professional judgement to determine if a telephone or video conferencing or video conferencing visit would be beneficial and aligned with the member's goals.	No Changes Required	Providers that determine telephone or video conferencing or video conferencing visits can meet the needs of the member must document assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Massage</b>	No modifications needed currently, as service provision allows for flexibility in place of service.	No Changes Required	
<b>Medication Monitoring</b>	No modifications appropriate for this service.	No Changes Required	
<b>Mental Health Counseling</b>	Mental Health Counseling providers may utilize telephone or video conferencing or video conferencing methods when rendering this service. The provision alternative for this service requires the professional	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the members must document the

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	administering the service to use their professional judgement to determine whether service integrity is maintained through a telephone or video conferencing or video conferencing delivery option and would be appropriate.		assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Mentorship</b>	Mentorship providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the provider administering the service to use their judgement to determine whether service integrity is maintained through a telephone or video conferencing delivery option and would be appropriate.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Movement Therapy</b>	Movement Therapy providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the provider administering the service to use their professional judgement to determine whether service integrity is maintained	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	through a telephone or video conferencing delivery option and would be appropriate.		managers of care plan changes.
<b>Non-Medical Transportation (NMT)</b>	No modifications for this service.	No Changes Required	No Changes Required
<b>Palliative Supportive Care</b>	Palliative and Supportive Care providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with positive medical outcomes and treatment goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Parent Education</b>	No provisions appropriate for this service.	No Changes Required	
<b>Peer Mentorship</b>	Peer Mentorship providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	conferencing visit would be beneficial and align with positive outcomes and goals.		assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Personal Emergency Response Systems (PERS)</b>	No provisions appropriate/safe for this service.	No Changes Required	
<b>Personal Care</b>	No modifications for this service.	No Changes Required	
<b>Pre-Vocational Services</b>	No modifications needed currently, as service provision allows for flexibility in place of service.	No Changes Required	
<b>Respite</b>	Respite services will have flexibility in location of service which may include in the home or another setting as needed.	The case manager will log note any changes in service location.	Providers must document the change in location of service. The provider must inform case managers of the changes.

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
<b>Supported Living Program (SLP)</b>	Based on best practices and published guidance on mitigating the spread of COVID-19, the SLP providers may modify visitor policies to home/ facility, modify community outings.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
<b>Specialized Medical Equipment and Supplies (SMES)</b>	No modifications for this service.	If additional services are needed by the member according to the requirements specified, the Case Manager will revise the members PAR and Service Plan to reflect the increased service level.	
<b>Specialized Habilitation-facility</b>	Specialized Habilitation facility services may be provided in alternative locations such as a member's home. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.	The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential	Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to



<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	<p>Specialized Habilitation providers that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p>	<p>changes needed to the service plan. Specialized habilitation will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</p>	<p>bill for retainer payments please refer to the informational memo published at: <a href="#">HCPF IM 20-017</a></p>
<p><b>Substance Use Counseling</b></p>	<p>Substance Use Counseling providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with the member's goals.</p>	<p>No Changes Required</p>	<p>Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.</p>
<p><b>Supported Community Connections</b></p>	<p>Supported Community Connections may be provided in the home or an alternative location, with minimal community integration. Providers may also utilize</p>	<p>The Case Manager will log note the suspension or reduction of services</p>	<p>Providers are strongly encouraged to utilize other service delivery options as specified in the Service</p>

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	<p>telephone or video conferencing methods, where appropriate, to provide services.</p> <p>Providers of Supported Community that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p>	<p>and work with the member, or member designated contact, to identify potential changes needed to the service plan. Supported Community Connections will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</p>	<p>Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at:</p> <p><a href="#">HCPF IM 20-017</a></p>
<b>Supported Employment</b>	<p>This service currently allows for flexibility in place of service. In addition, providers may also utilize telephone or video conferencing methods, where appropriate, to provide services. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and</p>	<p>No Changes Required</p>	<p>Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case</p>

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	align with member's employment needs and goals.		managers of care plan changes.
<b>Therapeutic Life Limiting Illness Support</b>	Therapeutic Life Limiting Illness Support providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with the member's therapeutic goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Transitional Living Program (TLP)</b>	TLP providers may modify visitor policies to home/ facility, modify community outings, in alignment with published guidance on how to mitigate the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
<b>Transition Set Up and Coordination</b>	No provisions appropriate/safe for this service.	No Changes Required	
<b>Vehicle Modifications</b>	Vehicle Modification providers may utilize telephone or video conferencing technology	No Changes Required	Providers must document when telephone or video

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	for professional evaluations. The preferred method being live video sharing.		conferencing assessments are conducted.
<b>Vision</b>	No provisions appropriate/safe for this service.	No Changes Required	
<b>Youth Day</b>	No modifications for this service.	No Changes Required	



### **Additional References for this document & Resource Links**

- [Recommendations for Long-Term Care Facilities](#) (CDC)
- [Steps Healthcare Facilities Can Take Now to Prepare for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [FAQS for Healthcare Providers Regarding Medicare Billing and Payment](#) (CMS)
- [Coronavirus Preparation and Response Toolkit](#) (Argentum)
- [Interim Health Care Infection Prevention and Control Recommendations for Patients Under Investigation for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [Handwashing Video](#) (Ecolab)
- [Information Regarding COVID-19](#) AHCA/NCAL (American Health Care Association / National Center for Assisted Living)
- [Handwashing 101](#) (ServSafe)

Follow the [CDC website](#) to keep up with the general trends and what's happening. Communicating with your [state health department](#) and watching local news will help you with specifics.

### **Attachment(s):**

None

### **Department Contact:**

[HCPF HCBS Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)

### **Department COVID-19 Webpage:**

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information, please call the CDPHE Call Center at 303-692-2700.  
For general questions about COVID-19: Call CO-Help at 303-389-1687 or

1-877-462-2911 or email [COHELP@RMPDC.org](mailto:COHELP@RMPDC.org), for answers in English and Spanish (Español), Mandarin (普通话), and more.