

# 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 provide clarity on previously issued guidance for ADS
- To receive input, suggestions, and ideas for flexible service delivery of ADS, including Specialized ADS

# Agenda

1. Review OM 20-091: Adult Day Services in Response to COVID-19 (previously OM 20-087)
2. Clarify previously issued guidance
3. Receive feedback on tiered ADS structure & implementation thus far
4. Discuss flexible service delivery options for Specialized ADS
5. Determine next steps

# OM 20-091: 3-Tier Structure

Effective on Sept. 14 for EBD, SCI & CMHS waivers

## Tier 1: 15-minute unit ADS

- \$2.54/15 minute-unit
- Up to 12 units or 3 hours a day
- Can be provided virtually or in-person
- Ideal for members who may be vulnerable, or do not want to be in a group setting or for those members who prefer telehealth services
- Waives many of the requirements of a facility-based setting (lockers, showers, meals, etc.)



# OM 20-091: 3-Tier Structure

## Tier 2: 1 Unit of In-Person ADS

- \$31.31/unit = 3-5 hours of service
- Must be provided in-person
- Allows for 2 “shifts” in day services
- Must meet all ADS requirements
- Can be combined with Tier 1 ADS

# OM 20-091: 3-Tier Structure

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

- OM 20-087 was revised due to error stating that 2 units of ADS = 6-10 hours of services
- More than 5 hours of service = 2 units of ADS
- Must be provided in-person
- Full regular day of ADS
- Must meet all ADS requirements
- Cannot be provided on same day as Tier 1



# OM 20-091: 3-Tier Structure

- Members have choice in how they would like to receive ADS based on needs and preferences
- A member can receive all 3 tiers of ADS within the same week on alternating days
- ADS providers can provide all 3 tiers of ADS
- Tier 3 cannot be combined with Tier 1 or 2
- Tier 1 and 2 can be provided in the same day
- Tier 1 via telehealth - Place of Service - 02
- Providers must document services rendered



# 3-Tier Structure: Service Authorization Changes

- Prior Authorization Requests (PAR)s need to be updated based on the member's preferences
  - Case Manager log notes should specify if member wants to receive Tier 1, Tier 2 or Tier 3 ADS or a combination of the tiers
- Maximum number of units allowed per Tier
  - For details see [OM 20-091](#)
- Tier 1 ADS use Procedure Code S5100
- Tier 2 & 3 ADS use Procedure Code S5105

# OM 20-091: 2-Tier Structure

Effective on Sept. 14 for BI waiver

## Tier 1: 15-minute unit ADS

- \$6.28/15 minute-unit
- Up to 8 units or 2 hours a day
- Can be provided virtually or in-person
- Ideal for members who may be vulnerable, or do not want to be in a group setting or for those members that prefer telehealth services
- Waives many of the requirements of a facility-based setting (lockers, showers, meals, etc.)



# OM 20-091: 2-Tier Structure

## Tier 2: 1 unit of in-person BI ADS

- \$77.30/unit
- 1 unit = 2+ hours of service
- Must be provided in-person
- Regular day of BI ADS
- Must meet all BI ADS requirements
- Cannot be provided on same day as Tier 1

# OM 20-091: 2-Tier Structure

- Members have choice in how they would like to receive BI ADS based on needs and preferences
- A member can receive both tiers of BI ADS within the same week on alternating days
- ADS providers can provide both tiers of BI ADS
- Tier 1 and 2 cannot be provided in the same day
- Tier 1 via telehealth - Place of Service - 02
- Providers must document services rendered



# 2-Tier Structure: Service Authorization Changes

- PARs need to be updated based on the member's preferences
  - Case Manager log notes should specify if member wants to receive Tier 1 or Tier 2 BI ADS
- Tier 1 BI ADS use Procedure Code S5100
- Tier 2 BI ADS use Procedure Code S5102



# Clarifying Guidance for ADS

- 2 units of ADS = more than 5 hours of service
- ADS Settings considered “Limited Health Care Settings” under Safer at Home Executive Order
  - Base site day services can reopen at 50% capacity or up to 50 people
- Activities, such as workbooks or packets, completed without the virtual presence or assistance of a staff member cannot be billed for



# Clarifying Guidance for ADS cont.

- NMT cannot be billed for if ADS is provided via telehealth
  - NMT can only be billed for if the member is present in the vehicle
  - PARs should end NMT if ADS is received only via telehealth
- Home delivered meals are not part of ADS service

# OM 20-091: Specialized ADS

- Provided under EBD, SCI & CMHS waivers
- Can continue to be provided either in-person or using telehealth during the public health emergency (PHE)
  - OM 20-087 stated it could not be provided via telehealth
- Not included in the 3-tiered structure to ADS
- More intensive service with additional requirements beyond Basic ADS
  - Nursing services
- Cannot be provided under a Tier 1 structure (15 minute unit)

# Feedback on New Tiered Structure to ADS

- How has the tiered structure been working?
- What 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?

# Suggestions for SADS

- Could a similar tiered structure work for SADS?
  - Such as virtual, current practice, and small group or individual SADS
- What if SADS providers were to bill for Tier 1 Basic ADS when ADS provided via telehealth?
  - If PARS are updated to include Tier 1 Basic ADS, SADS providers are able to bill for Tier 1 Basic ADS
- What long-term changes could improve the quality of this service?
- Other ideas or suggestions?

# Next Steps

Next Adult Day Services (ADS) Stakeholder Meeting:

Thursday, October 8th from 9:00 - 11:00 a.m.

Webinar Link: <https://cohcpf.adobeconnect.com/ads/>

Call-in Information:

1-877-820-7831

Participant Code: 706065#





# Questions?



# Contact Info

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# Thank you!

