



## SLS CDASS Case Manager Training Q&A

The following questions and answers were discussed during the Supported Living Services (SLS) Case Manager Trainings for Consumer Directed Attendant Support Services (CDASS) implementation that took place January 31 – February 8, 2018.

### GENERAL QUESTIONS

QUESTION	ANSWER	CITATION (if applicable)
<b>In CDASS, “Accompanying” is a service allowable per the Task Worksheet, what is accompaniment?</b>	Accompanying is defined as going with the Client to provide one or more personal care services as needed during the trip. It includes going with the Client, as necessary on the care plan, to medical appointments and errands such as banking and household shopping. Accompanying is also available on the Task Worksheet under health maintenance services based on skill level needed to perform the support. Companionship is not a benefit of CDASS.	<a href="#">10 CCR 2505-10 § 8.510.3.B.2.m</a>
<b>What is the definition of family?</b>	For CDASS, family is defined as all persons related to the Client by virtue of blood, marriage, adoption, or common law.	<a href="#">10 CCR 2505-10, § 8.510.16.A.</a>
<b>If a Client transfers to SLS from another waiver, does CDASS transfer with them?</b>	CDASS will transfer with the Client however CDASS in SLS has some unique distinctions from other waivers. Case Managers should work with the Client/AR to understand their SPAL, budgeting, and available services. Clients will need a new Task Worksheet and Monthly Allocation completed that is specific to SLS. Case Managers should encourage the Client/AR to participate in retraining with Consumer Direct to ensure they fully understand the differences. The Client/AR should complete an updated ASMP to outline their plan for managing any changes in services or their budget.	
<b>Can you provide definitions for skilled vs non-skilled care?</b>	Skilled tasks are those typically performed by a certified or licensed medical professional. See individual task definitions in the Task Worksheet spreadsheet or in rule as cited.	<a href="#">10 CCR 2505-10 § 8.500.94.A.17</a>
<b>How will the Case Manager verify the amount of skilled services being requested for Clients changing from LTHH to CDASS?</b>	Case Managers should utilize the CDASS definitions for each task, CNA skilled care regulations in rule, any existing LTHH care plans the Client had received and consult with registered nurses on staff to assist them with determining service needs and frequency.	CNA Skilled Care Regulations: <a href="#">10 CCR 2505-10 § 8.520.5.B.12.A-S</a>
<b>Does CDASS cause the Client to have two separate certification periods?</b>	No. The dates for CDASS authorization will coincide with the Client’s already established certification period.	

QUESTION	ANSWER	CITATION (if applicable)
<b>What happens if a Client/AR exhausts the use of all three FMS providers?</b>	There are only 3 Financial Management Services (FMS) providers in Colorado to choose from. The Client/AR must choose to work with one of the providers to access the CDASS service delivery option.	<a href="#">Consumer Direct of Colorado - Client Resources</a>
<b>If the Client goes into the hospital or a facility, will they need to re-enroll in services when they discharge?</b>	If a Client is transitioning from a Hospital or Nursing Facility, the Case Manager shall work with the Discharge Coordinator to ensure the discharge date and CDASS start date correspond. If their HCBS case has closed, they will need to complete the intake assessment process for HCBS eligibility and re-enroll with the FMS provider. The Case Manager is required to refer the Client/AR to complete retraining with Consumer Direct if sufficient time has elapsed.	<a href="#">10 CCR 2505-10 § 8.510.9.E.</a>
<b>What happens if an AR decides they no longer wish to be an AR?</b>	If an AR decides to step down from their role they must work with the Client supports to identify a new AR. The new AR must complete training with CDCO and the enrollment with the FMS provider. The current AR must remain in place until the new AR is fully established, to ensure the Client's health and safety needs are met. The process to add or transfer an AR can take 45-60 days.	<a href="#">CDASS Training Manual, Section 2</a>
<b>Can a Client have more than one AR?</b>  <b>Can an AR delegate their duties if they are going to be unavailable (i.e. due to surgery, vacation, etc.)?</b>	Clients may only have one CDASS AR.  There is no protocol in place for an AR to delegate their responsibilities. When they enroll as the Client's AR they agree to fulfill the AR responsibilities until a new AR can take over.	<a href="#">10 CCR 2505-10, § 8.510.1</a>
<b>If a Client is terminated from CDASS, are they able to re-enroll?</b>	The ability to return to CDASS would be determined based on the reason for termination. Clients who are terminated according to 10 CCR 2505-10, § 8.510.12 may be re-enrolled for future CDASS service delivery. Termination for reasons listed at 8.510.13 would make the Client ineligible for CDASS in the future.	<a href="#">10 CCR 2505-10, § 8.510.12-13</a>
<b>Does the Case Manager need to complete a new 100.2 and Service Plan (SP) if a Client decides they want to use to CDASS?</b>	No. CDASS is not a new waiver, it is an option for how services are delivered. Case Managers should ensure the Bridge is updated to reflect CDASS services and ensure the 100.2, Bridge, and authorized CDASS services all align.	<a href="#">10 CCR 2505-10, § 8.510.14</a>
<b>What is the anticipated implementation date for SLS CDASS?</b>	There is no date set at this time. The Department is working on preparing the Bridge system for CDASS and will issue a date as soon as it is established.	
<b>Can a PASA be the CDASS Authorized Representative?</b>	It must be a single individual who meets all of the criteria outlined on the <a href="#">CDASS Authorized Representative Designation and Affidavit</a> . It cannot be a provider agency.	<a href="#">10 CCR 2505-10, § 8.510.1</a>

QUESTION	ANSWER	CITATION <i>(if applicable)</i>
<b>What would be the benefit of having both a CDASS AR and a Client Representative?</b>	<p>Clients have two options if a CDASS AR is required. The Client can have one individual fulfill both the CDASS AR role and Client Representative role for all other SLS services, or select to have a different individual for each role. Only an SLS Client Representative who is also designated as the CDASS AR can perform both roles, otherwise the roles are not interchangeable. In either option, the CDASS AR cannot be a paid attendant.</p> <p>The benefits of each option can vary based on the Client's individual support needs and support system. The Client and support system should have a discussion on which option is the best fit.</p>	<p>Client Representative Definition: <a href="#">10 CCR 2505-10, § 8.500.90</a></p> <p>CDASS Authorized Representative Definition: <a href="#">10 CCR 2505-10, § 8.510.1.</a></p>
<b>Is using an FMS provider a requirement?</b>	Yes. Every Client must choose one of the three FMS providers to serve as their Fiscal Employer Agent (F/EA).	<a href="#">10 CCR 2505-10, § 8.510.86.A</a>
<b>Can a legal guardian be a paid attendant?</b>	Yes. Anyone who is at least 18 years of age and passes the background and board of nursing checks can be a paid attendant. The CDASS AR cannot serve as a paid attendant and cannot be paid for AR duties.	<a href="#">10 CCR 2505-10, § 8.510.8</a>
<b>Do attendants need to have CNA Training?</b>	No. CDASS waives aspects of the Nurse Practice Act and allows the Client/AR to hire any attendant of their choosing to provide their care needs. Skilled tasks typically performed by an RN or CNA can be performed by anyone the Client/AR designates. It is up to the Client/AR as the employer to train their attendants properly on their health and safety needs.	<a href="#">10 CCR 2505-10, § 8.510.6.B</a>
<b>Will SLS Clients currently receiving Home Health now go through CDASS or will that service remain the same?</b>	All current SLS services will remain the same. CDASS is being added as another option for how Clients services are delivered.	
<b>Is there a database of Authorized Representatives a Client can use?</b>	Not currently. Because the Authorized Representative must have known the client for at least two years, there is no database available for appointing these. It is a very important, personal decision the client and their support systems should make about who they want to oversee and manage their CDASS services.	
<b>How does a continued stay review (CSR) work as opposed to a new enrollment?</b>	At the CSR the Case Manager will obtain a new Physician Attestation Form to ensure continued stable health and ability to manage services or need for an AR. The Case Manager will review the Client's CDASS Task Worksheet and Monthly Allocation to ensure it meets the Client's needs and any changes in needs have been accounted for. Once this is	<a href="#">10 CCR 2505-10, § 8.510.14.J</a>

QUESTION	ANSWER	CITATION (if applicable)
	complete along with all other CSR requirements, Case Managers will follow steps to complete the PAR and authorize services for another certification period.	
<b>Under what circumstances would CDASS under SLS be more beneficial to the Client than CDASS through the EBD Waiver?</b>	Waiver choice is based on eligibility requirements, individual support needs, and interest in available services. Case Managers should work with Clients and their support system to understand the full menu of services available to them on the adult waivers. Clients and their support systems should make decisions based on what waiver best meets their health and safety needs. The foundation of CDASS is the same across all eligible waivers.	
<b>Is training available in Spanish and/or any other languages?</b>	Yes. Consumer Direct has Spanish speaking staff and can provide any reasonable accommodations the Client/AR needs.	
<b>Can a Client have both regular SLS Personal Care through an agency and CDASS Personal Care?</b>	No. If a Client chooses the CDASS service delivery option they are choosing to self-direct all their homemaker, homemaker enhanced, personal care and health maintenance services. Case Managers shall not authorize, on the PAR, concurrent payments for CDASS and other waiver service delivery options for Personal Care services, Homemaker services, and Long-Term Home Health for the same individual.	<a href="#">10 CCR 2505-10, § 8.510.10.A &amp; B</a>
<b>Can a Client have Personal Care through CDASS and Homemaker through an agency?</b>	No. See above answer.	<a href="#">10 CCR 2505-10, § 8.510.10.A &amp; B</a>
<b>What do we tell Clients/families are the benefits of CDASS? Is there a document we can give them?</b>	CDASS offers Clients the flexibility, choice, and control over their services. With CDASS they are both the managing and legal employer of record. The Client oversees all aspects of their care including recruiting, hiring, setting rates of pay, training, supervision and if necessary, termination. Consumer Direct (CDCO) is a great resource for Case Managers and Clients who want more information about CDASS.	<a href="#">Consumer Direct of Colorado – Resources</a>
<b>Can a Client have day habilitation and CDASS? What about Respite?</b>	Yes. The Client may not receive other homemaker, homemaker enhanced, personal care, or long-term home health services in conjunction with CDASS. However, they do still have access to the other menu of services available under the SLS waiver.	

QUESTION	ANSWER	CITATION (if applicable)
<b>Who trains the attendants on the health maintenance task?</b>	The Client/AR who is the managing employer is responsible for training their attendants. Even for tasks that would be traditionally skilled, the Client/AR is responsible for ensuring their attendants are trained and follow all proper safety procedures they require. During CDASS Training with CDCO, the Client/AR is given information on safety and OSHA requirements.	

## FORMS QUESTIONS

QUESTION	ANSWER	CITATION (IF APPLICABLE)
<b>How does the Case Manager determine if the AR has a mental health issue?</b>	The CDASS AR will complete an <a href="#">Authorized Representative Designation and Affidavit</a> where they acknowledge the individual meets all criteria to serve as a CDASS AR. The Case Manager needs to obtain the signed affidavit as verification.	<a href="#">10 CCR 2505-10 § 8.510.6.C</a>
<b>What happens if the Client's health becomes unstable while they are on CDASS?</b>	Clients on CDASS must be in stable health as indicated by their physician on the <a href="#">Physician Attestation Form</a> . If they become unstable at any time as indicated on this form, they should be transitioned off CDASS and the Case Manager should work to secure other service delivery options.	<a href="#">10 CCR 2505-10 § 8.510.2.A</a>
<b>What are "Cost to You" wages referenced on the CDASS Attendant Support Management Plan?</b>	The 'cost to you' amount is the total hourly wage that will come out of the Clients CDASS monthly allocation. The cost includes employer taxes and workers' compensation insurance costs. Each FMS provider has their own 'cost to you' percentage that they collect. The Client/AR must be aware of this during budgeting to ensure they do not overspend.	<a href="#">CDASS Training Manual, Section 5</a>

## BUDGET QUESTIONS

QUESTION	ANSWER	CITATION <i>(if applicable)</i>
<b>If the Client/AR does not utilize all their allocated funds, can it be used the following month?</b>	The Client is certified for an annual allocation that aligns with their certification period. Unused funds carry over as a reserve for the duration of the certification period and can be accessed by the Client to pay for approved care. At the end of their certification period any unused reserves are returned to the general Medicaid fund. It is very common for the Client/AR to set up their budget with a small reserve in case they have unanticipated changes in their needs. Allocations should always be determined based off the Client's needs.	<a href="#">CDASS Services Utilization Review &amp; Allocation Management Protocol</a>
<b>Does the Per Member Per Month (PMPM) fee count against the Client's SPAL?</b>	No. The PMPM fee that is paid to the FMS provider as indicated on the PAR is outside of the Client's SPAL and overall waiver cap.	
<b>Do CDASS services have to stay within waiver service caps?</b>	Homemaker, Homemaker Enhanced, and Personal Care will all count against the Client's SPAL and overall waiver cap. Services authorized in Health Maintenance will be outside of the SPAL and overall waiver cap.	<a href="#">10 CCR 2505-10 § 8.500.102</a>
<b>Is the overspending protocol for the lifetime of the Client or just the certification period?</b>	The steps initiated by Case Managers with the overspending protocol apply to the lifetime of the Client's CDASS services.	<a href="#">CDASS Service Utilization Review &amp; Allocation Management Protocol for Case Management</a>
<b>How are rates of pay determined?</b>	The Client/AR will work with Consumer Direct to develop their ASMP and determine how much they can afford to pay their attendants based on the approved allocation amount. Clients have budget authority to set different pay rates based on the attendant's skill level and expertise.	<a href="#">CDASS Attendant Rate Setting Guide</a>
<b>Who will assist the Client with setting up their budget and completing their ASMP?</b>	During CDASS training with CDCO the Client/AR will receive assistance and training on how to set up their budget. Future adjustments to their budget and completion of an updated ASMP does not have to come through CDCO. Additional support and training with CDCO is always available if the Client/AR needs assistance. Case Managers can make a retraining referral at any time.	

**For other questions or training needs, please contact  
Consumer Direct Colorado at  
844-381-4433 or [infocdco@consumerdirectcare.com](mailto:infocdco@consumerdirectcare.com)**