

## Consumer-Directed Attendant Support Services and In-Home Support Services Member and Authorized Representative Open Forum Questions and Answers

On February 12<sup>th</sup>, 2025, Consumer Direct for Colorado hosted an open forum for Consumer-Directed Attendant Support Services and In-Home Support Services members and Authorized Representatives. This is a summary of the questions and answers discussed during the meeting.

### Key Terms and Definitions:

**Colorado Department of Health Care Policy and Financing (HCPF)** - The state agency that oversees and operates Health First Colorado (Colorado's Medicaid program), Child Health Plan *Plus* (CHP+), and other public health care programs for Coloradans who qualify.

**Community First Choice (CFC)** - Also known as 1915(k). CFC provides eligible members CDASS and IHSS through Health First Colorado without waiver restrictions.

**Consumer Direct for Colorado (CDCO)** - Colorado's training and support contractor for CDASS and IHSS.

**Consumer-Directed Attendant Support Services (CDASS)** - Health First Colorado benefit program that lets a member, or their Authorized Representative (AR), direct and manage attendants who provide in-home care. The member/AR is the legal employer.

**Financial Management Services (FMS)** - Contracted companies that provide fiscal and administrative services for CDASS members.

**Home and Community Based Services (HCBS)** - Services and supports authorized through 1915(c) waivers of the Social Security Act and provided in community settings to a Medicaid Member who requires a level of institutional care that would otherwise be provided in a hospital, nursing facility, or intermediate care facility for individuals with intellectual disabilities as described at 42 CFR 441.300, et seq.

**In-Home Support Services (IHSS)** - Health First Colorado benefit program that lets a member, or their Authorized Representative (AR), work with an IHSS agency to direct and manage attendants who provide in-home care. The IHSS agency is the legal employer.

### Open Forum Questions and Answers for CDASS and IHSS

| CDASS & IHSS Question  | Answer  | Citation  |
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| What changes to Consumer-Directed Attendant Support Services (CDASS) and In- | <b>Community First Choice (CFC)</b> - Starting July 1, 2025, CDASS and IHSS will transition from Home and Community-Based (HCBS) waivers to Medicaid State Plan. This means that CFC expands access to CDASS and IHSS, along with other services, to more | <a href="#">Community First Choice Option</a><br><a href="#">Update on Office of Community Living Priority Projects</a> |

| CDASS & IHSS Question                                   | Answer  | Citation |
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| <p>Home Support Services (IHSS) will occur in 2025?</p> | <p>eligible Health First Colorado (Colorado's Medicaid Program) members. The goal of CFC is to make self-directed services more accessible for more people. Minimal changes to caregiving requirements will occur because members will experience more flexibility in how their caregivers can provide care.</p> <p>As part of this transition, the service requirements for CDASS and IHSS will be aligned. One example of this is regarding caregiver limits. Currently, members who utilize IHSS may only reimburse family members up to 40 hours/week, while members who utilize CDASS must limit family member reimbursement to 40 hours/week per family member. In CFC, there will no longer be a 40 hour/week family caregiver limit. However, there will be a limit to any Legally Responsible Person employed as an attendant and providing homemaker services for a CDASS or IHSS member. These individuals may only provide homemaker services for up to 520 hours/year. For more information about the upcoming changes, please review the materials available on the Community First Choice webpage.</p> <p><b>Task Worksheet/Direct Care Services Calculator</b> - The new CFC Direct Care Services Calculator will replace the existing CDASS and IHSS Task Worksheets. These worksheets have been used to determine the level of service needs for homemaker and personal care services across different care settings, including agency-based care, IHSS and CDASS. The calculator will now be used to determine a member's service level needs.</p> |          |

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|   | <p><b>Skilled Nurse Assessor</b> - Starting in July 2025, a Skilled Nurse Assessor will be performing reviews of skilled care. For more information, please reference the citation. For a full list of Healthcare Policy and Financing's (HCPF) Priority Projects relating to Long-Term Services and Supports please reference the citation.</p> <p><b>Training Terminology</b> - Consumer Direct will not be using the term training for members and Authorized Representatives (AR). The term will be replaced with orientation and coaching. These terms more accurately describe the experience of learning about CDASS and IHSS as one gets started on the program. Consumer Direct will continue to offer orientation and coaching in a variety of formats.</p>               |   |
| <p>Please clarify the rules for providing personal care and health maintenance to family members in CDASS and IHSS.</p> | <p>Currently in both CDASS and IHSS, family members including spouses can complete personal care and health maintenance activities (HMA). In IHSS, family members are limited to providing 40 hours/week of personal care and there is no limit for HMA. In CDASS, family members are limited to providing 40 hours/week of service (combined homemaker, personal care, and HMA). As previously mentioned, these limits will change when CFC is implemented.</p> <p>Personal care tasks are unskilled and health maintenance tasks are skilled. HMA tasks would typically be performed by a nurse; however, CDASS and IHSS waive the Nurse Practice Act. This means that in CDASS and IHSS, members are allowed to select and train their attendants to complete skilled tasks.</p> | <p><a href="#">10 CCR 2505-10 § 8.7527.E</a></p> <p><a href="#">10 CCR 2505-10 § 8.7536.D</a></p> <p><a href="#">10 CCR 2505-10 § 8.7522.B</a></p> <p><a href="#">IHSS FAQs</a></p> |

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|   | HMA may include related personal care and homemaker services if such tasks are completed during the health maintenance visit and are secondary and contiguous to the health maintenance activity. For example, the relative care provider empties and cleans the commode following toileting/bowel program. This homemaking task could either be contiguous to personal care or health maintenance activities depending on the skill level of the primary task (personal care vs. HMA).  |  |
| Could you discuss political changes affecting Medicaid budgets and programs? Will CDASS and IHSS still exist if federal funding is cut?   | HCPF is monitoring federal actions and communications. We will communicate future impacts to medical assistance programs as they are known. The best place to get this information is by signing up for the Office of Community Living Digest newsletter and subscribing to the Office's stakeholder engagement calendar.  | <a href="#">HCPF Office of Community Living Digest Newsletter</a><br><br><a href="#">HCPF Office of Community Living stakeholder engagement calendar</a> |
| Both of my caregivers, specifically my spouse, must purchase healthcare through the Connect for Health Colorado site. Is there anything being considered soon to offer healthcare to Caregivers outside of the marketplace? | Most IHSS agencies offer health insurance for their employees. For CDASS, HCPF is not able to provide health insurance to attendants because it nor the FMS is the employer. However, CDASS employers have some options to help their employees secure health insurance. CDASS employers can 1. build the cost into the employee's hourly wage so long as they remain in budget and the member continues to get their care needs met. 2. share information about the Medicaid buy-in program, which is available to working adults with a disability, and/or 3. look into the Small Business Health Options Program which allows small businesses with 1-50 employees to access group health | <a href="#">Small Business Health Options Program</a>  |

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|   | insurance plans through the marketplace and potentially earn tax credits.   |   |
| How do my attendants get healthcare benefits?                         | Attendants in both CDASS and IHSS are eligible for sick leave and family and medical leave insurance. As mentioned previously, access to health insurance is offered by most of IHSS agencies and CDASS employers have some options to support their employees getting access to a health plan.   | <a href="#">Family and Medical Leave Insurance</a><br><a href="#">Paid Sick Leave</a> |
| How do I check Sick Time for my attendants? Or how can they check it? | Both Public Partnerships (PPL) and Palco provide resources and training on how to access the current amount of sick leave a CDASS attendant has accumulated and how to submit sick time. Please click the links in the citation column for more information.<br><br>Attendants serving IHSS members should contact their IHSS agency's administration or Human Resources department to ask about their balance of sick leave hours and how to submit leave requests.  | <a href="#">PPL Website</a><br><a href="#">Palco Website</a>                          |
| Can I get extra time approved for acute injuries or surgeries?        | For CDASS members, CDASS employers can save up some of the CDASS monthly allocation to be used as "reserves" to pay attendants for the additional hours. However, employers must remember that any amount over 130% of the monthly budget will not be paid out and the case manager must be notified about this plan in advance of the attendant(s) working more hours.<br><br>For IHSS members, the member should discuss the need for more hours with their case manager and IHSS agency.<br><br>If a member experiences an injury or surgery that results in a permanent change of condition, they should let their case | <a href="#">Overspending Protocol</a>   |

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|   | manager know and request a reassessment of their needs.  |  |
| What is Consumer Direct doing to improve communication between members and CDASS employers and would be caregivers? | Consumer Direct has several resources for finding attendants and keeping attendants, including strategies for good communication. These resources are available on Consumer Direct's website and through more one-on-one support from its Information and Assistance program. Information and Assistance is available for CDASS and IHSS members and Authorized Representatives.   | <a href="#">Consumer Direct Website</a><br><a href="#">Information and Assistance</a>  |
| How do I get attendants through your online website?  | There are several resources to find new attendants. Employers can look through Consumer Direct's attendant directory or sign up for Colorado's Direct Care Careers website. If more in-depth assistance is needed, a member/Authorized Representative (AR) can use Information and Assistance Services to get one-on-one help. Consumer Direct provides Information and Assistance and tailors it to the needs of the member/AR. | <a href="#">Consumer Direct - Find an Attendant</a><br><a href="#">Direct Care Careers</a><br><a href="#">Information and Assistance</a> |

### Open Forum Questions and Answers for CDASS

| CDASS Question  | Answer   | Citation  |
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| Since Homemaker Enhanced is being eliminated with Community First Choice CFC, won't this reduce my CDASS budget if the same services are no longer budgeted at a higher rate? | The rates for Community First Choice (CFC) have not yet been finalized, so it is not possible to say how the changes to Homemaker Enhanced will impact CDASS allocations. It is important to note that while the reimbursement rates for CDASS may be changing, members who have historically received CDASS through the Supported Living Services (SLS) waiver will no longer be limited by the Service Plan Authorization Limit and will be able to access all services that are deemed medically necessary. Members who | <a href="#">Community First Choice Fact Sheet</a> |

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|  | previously had access to Enhanced Homemaker on the SLS waiver will continue to receive access to Extraordinary Cleaning through the SLS waiver.   |  |
| Why is there a rate cap of \$51.43 in CDASS when it is so hard to find caregivers?   | As of February 2025, the maximum pay rate a CDASS employer can set for an attendant is \$57.68. It is capped at 1.5 times the hourly reimbursement rate that HCPF sets for CDASS. This limit is to ensure that employers who are required to pay overtime can do so, to allow flexibility for pay increases, and to enable employers to recruit more skilled workers. Additionally, the limit provides some “guardrails” to ensure a member’s CDASS allocation is properly budgeted to cover all service needs for the full certification year. | <a href="#">PPL Cost to You</a><br><a href="#">Palco Cost to You</a>                               |
| How do I know if I’m paying my attendants enough? I’ve had feedback from my employees that they want more money, but if I pay more money that means less hours for me. | Determining attendants’ pay rates can be challenging and keeping quality attendants is important. Ultimately, the amount attendants are paid per hour is completely up to the CDASS employer, as long as they stay in budget and the rate is at least the appropriate minimum wage and no more than the CDASS maximum wage. If a CDASS employer needs assistance with deciding if increase is possible, they can request their case manager submit a coaching referral or Information and Assistance through Consumer Direct.                   | <a href="#">Consumer Direct of Colorado</a>  |
| My employees have a hard time getting responses to email inquiries from the FMS, we are wondering if there’s any way around that.                                      | Both PPL and Palco can be reached via email and telephone.<br><br><b>Palco Customer Service</b><br>Telephone: 501-604-9936<br>Email: <a href="mailto:co-cdass@palcofirst.com">co-cdass@palcofirst.com</a><br><br><b>PPL Customer Service</b><br>Telephone: 1-888-752-8250   | <a href="#">PPL First</a><br><a href="#">Palco First</a><br><a href="#">Changing FMS Providers</a> |



| CDASS Question  | Answer  | Citation                             |
|---|---|--------------------------------------|
|   | <p>Email: <a href="mailto:ppcdass@pplfirst.com">ppcdass@pplfirst.com</a></p> <p>Members and Authorized Representatives can also switch FMS providers every quarter during open enrollment.</p> <p>If issues getting prompt and/or complete responses from your FMS continue to be a problem, you can contact the Department of Health Care Policy and Financing (HCPF) to make a complaint.</p> <p><b>HCPF Participant-Directed Programs Unit</b></p> <p>HCPF complaint form for CDASS/IHSS: <a href="https://sites.google.com/state.co.us/pdpissues">sites.google.com/state.co.us/pdpissues</a></p> <p>Telephone: 303-866-5638</p> |                                      |
| Is it okay to have family or friends help when employees aren't available and not pay them? Would I need to put each one of them on the payroll if I would like to pay them? Is there a limit to the amount of people that I can put on the payroll and are they required to have a certain amount of time each week or can it be prescribed as needed? | If your family and friends are okay with filling in as needed, they can provide care without being paid. Yes, they would all need to be put on the payroll if you would like to pay them. You must maintain a minimum of two attendants, with a limit of 49 attendants. There is no required amount of time that they must work each week, they could just be back-ups and work when needed.  | <a href="#">Two Attendant Policy</a> |

### Open Forum Questions and Answers for IHSS

| IHSS Question  | Answer  | Citation  |
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| <b>When a member does not require an Authorized Representative, does the IHSS Shared Responsibilities Form</b> | Yes, the Shared Responsibilities Form is required for members regardless of whether they have an AR. The IHSS agency signs this form, they are responsible for filling out with the member. | <a href="#">Shared Responsibilities Form Operational Memo</a> |



| IHSS Question  | Answer   | Citation  |
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| <b>still need to be completed?</b>   |  |   |
| <b>Some IHSS agencies do not allow any overtime hours for relative attendants that have been approved for members. Is this allowed since the hours are needed?</b> | An IHSS Agency is required to comply with the Fair Labor Standards Act (FLSA). For additional information regarding FLSA, please visit the Colorado Department of Labor website. | <a href="#">Colorado Department of Labor &amp; Employment</a> |
| <b>Will there be any changes to allow family members to provide homemaker services under IHSS?</b>   | Yes, after the implementation of CFC in July 2025, regulations will be expanded to allow up to 520 hours/year of homemaking care be provided by a Legally Responsible Person.    | <a href="#">Community First Choice Option</a>                 |

## Contact Information

### Colorado Department of Health Care Policy and Financing

[Participant-Directed Programs \(PDP\) Unit Issues and Feedback Report Form](#)

Email: [HCPF\\_PDP@state.co.us](mailto:HCPF_PDP@state.co.us)

Call: 303-866-5638

[Participant-Directed Programs website](#)

### Consumer Direct Care Network Colorado/Consumer Direct for Colorado

Email: [infocdco@consumerdirectcare.com](mailto:infocdco@consumerdirectcare.com)

Call: 844-381-4433

[Consumer Direct for Colorado website](#)

### Public Partnerships, LLC (PPL)

Email: [ppcdass@pplfirst.com](mailto:ppcdass@pplfirst.com)

Call: 888-752-8250

[Public Partnerships website](#)

### Palco

Email: [CO-CDASS@palcofirst.com](mailto:CO-CDASS@palcofirst.com)

Call: 866-710-0456

[Palco website](#)