

### **Alliance Membership Questions for HCPF 3.16.20**

1. Will the state make allowances to extend due dates for annual trainings that pertain to groups? *E.g.*, QMAP and SAFETY CARE? We will need extensions in order to not bring people together in close quarters.
2. Will there be funding for our residential agencies to have people at home versus day program?
3. Can you provide spec hab or day services in the home if day programming is interrupted for individuals?
4. Will there be a stipend given if we are required to pay employees outside of the 4 approved sick days?
5. Will there be a general protocol or recommendation from CDPHE/HCPF for responding to a COVID-19 diagnosis for an individual in a HH setting?
6. What is the expectation for providing SLS services (groceries, med appts, etc.) if an individual is diagnosed with COVID-19? Who is responsible for setting up the contingency plan?
7. How does the CMS COVID-19 Emergency Declaration Health Care Providers memo apply?  
[https://drive.google.com/file/d/1xbN\\_auzsQudsMVGxb5xCoAhRHZ-2gVX/view](https://drive.google.com/file/d/1xbN_auzsQudsMVGxb5xCoAhRHZ-2gVX/view)
8. Will HCPF provide guidance for community-based and in-home services? This will likely lead to additional questions.
9. If we need to shut down how will billing be affected?
10. Is Colorado planning on submitting an "Appendix K" for each of the state's 1915c HCBS waivers to provide flexibility for the provision of services during the coronavirus outbreak?
11. Is HCPF giving any consideration to any type of emergency funding should we have to close day programs or group living situations, pay lots of overtime for staff, lose additional enrollments due to attrition, etc.?
12. Are there "Business Interrupted Funds" available to providers? Federal or State?
13. What options does a residential agency have if a client tests positive for COVID 19 and the host home refuses to let them return?
14. What do we do if staff in a group home refuse to work with folks or host home providers call and tell us they won't care for their clients anymore?
15. This will likely cause lots of capacity issues. For example, who is going to volunteer to do respite for someone who has or has been exposed to COVID-19? What flexibilities can help us address these shortages?
16. COVID-19 is causing clients to request telehealth sessions in increasing volumes but HCPF seems to be denying some services that were outlined in HB17-1094. Can we get some clarity/flexibility, as there is a high request for telehealth services?
17. Will this delay EVV implementation?
18. Retainer Payments:
  - a. Do providers bill the same rate for retainer payments?
  - b. Do retainer payments include transportation?
  - c. Do retainer payments include community connector day programs?
  - d. Will state retainer payments cover:
    - in home therapies (massage; music, etc)
    - in home personal care

employment services

transportation

Do retainer payments apply to supported employment?

Do retainer payments include behavior therapy services that were approved?

Will retainer payments apply to State fund day hab services?

- e. The memo regarding retainer billing mentions that in order to bill there must be authorization and documentation in the service plan. Is there a process for getting this done?
  - f. The retainer payments say they must be authorized/documented in persons plan, however the response time of CCB's with those requests are concerning. Do we request and proceed as if it will be documented?
  - g. What type of documentation is required for the Service Plan for the retainer payment.
  - h. Does the retainer payment needed to be added into service plan as a retainer or billed as normal?
  - i. If we provide services in different locations do we still bill the current service in the individuals plan or do we need to request a revision and bill for what the service most clearly reflects? For example if we are providing Day Program services in the individuals home but they usually attend activities in the community and have SCC units, do we need to make a revision to bill Day Hab?
  - j. If client chooses to stay home (or HHP) chooses can we still bill retainer units?
  - k. I saw a memo indicating that retainer payments need to be written in the plan. How will this be tackled?
19. Can spec hab be provided in the home as an alternative service?
20. Will there be flexibility in spend down of Family Support dollars for this year since will not be used by end of year?
21. Telehealth
- a. Is telehealth for behavior counseling approved?
  - b. Will we be allowed to support people without face to face contact if person is ill? Our agency plans to cook, shop, etc. for people as needed.
  - c. Can some SLS services be provided electronically?
  - d. Will the state make any allowances for tele-health music/movement therapy visits?
  - e. According to HCPF's policy team, music/movement therapy can be offered via telehealth per HB15-1029 and HB17-1094. HCBS seems to be communicating conflicting information though, so I'd like to see HCPF coordinate internally and communicate an aligned memo on this. Also, we are wondering if massage therapy can be offered via teletherapy, via parent education.
  - f. There was guidance that Medicaid behavior therapy codes could temporarily be utilized in a Telehealth format. Can we seek guidance on what this includes (parent treatment planning? Parent communication via email and phone? Creating home lessons? Data analysis?)
  - g. ***Has there been any guidance regarding Early Intervention Providers being able to do Telehealth or video for their visits? (CDHS)***

- i. we moved out EI providers to teletherapy...there was a little guidance sent out next week but I am wondering if we need to change PARS to reflect that mode of delivery in order to get paid. Waiting on an answer for that.
- 22. Can you please clarify the screening guidelines - are they for both day program and residential settings or just day program settings? What if admin and day program are in the same building - do we need to implement screening guidelines for all admin staff?
- 23. Really good point that it will become quite problematic if people told that if they live in an area of community transmission, they should not work, or should self- isolate. Future guidance there would be appreciated.
- 24. Is there a list of "community-based spread" communities? It's my understanding that most cases have known exposure or its under investigation. Haven't seen direction on this.