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

On March 16th, 2026, Consumer Direct for Colorado hosted an open forum for Consumer-Directed Attendant Support Services (CDASS) and In-Home Support Services (IHSS) members and Authorized Representatives. This document is a compilation of relevant questions and answers discussed during the meeting. Some questions from previous open forum sessions have been added as they provide good general information for stakeholders about CDASS and IHSS.

Key Terms and Definitions:

Attendant – The person paid to provide services for the member.

Authorized Representative (AR) – An individual who manages care on the member's behalf if the member cannot. They are sometimes the legal employer of CDASS attendants.

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) – The 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 for attendants.

Member – The person who receives services and directs their in-home health care services. They are the legal employer of attendants.

Open Forum Questions and Answers for CDASS and IHSS

CDASS & IHSS Question	Answer	Citation
What changes to Consumer-Directed Attendant Support Services (CDASS) and In-Home Support Services (IHSS) will occur in 2026?	**Community First Choice (CFC)** - 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 eligible Health First Colorado (Colorado's Medicaid Program) members. The goal of CFC is to make self-directed services more accessible for more people. By July 1, 2026, all members participating in CDASS and IHSS will receive the service through CFC. Minimal changes to caregiving requirements will occur because members will experience more flexibility in how their caregivers can provide care. 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 260 hours/year. For more information about the upcoming changes, please review the materials available on the Community First Choice webpage. **Task Worksheet/Direct Care Services Calculator** - The new CFC Direct Care Services Calculator will replace the existing	Community First Choice Option Update on Office of Community Living Priority Projects

CDASS & IHSS Question	Answer	Citation
	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. **Skilled Nurse Assessor Program**- Ended effective December 22nd, 2026. **Health Maintenance (HMA) Approval -** Effective December 22, 2025, case managers resume full responsibility for determining HMA hours using the Direct Care Services Calculator (DCSC), Health Maintenance Activity (HMA) Guide.	
Please clarify the rules for providing personal care and health maintenance to family members in CDASS and IHSS.	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. 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. 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,	10 CCR 2505-10 § 8.7527.E 10 CCR 2505-10 § 8.7536.D 10 CCR 2505-10 § 8.7522.B

CDASS & IHSS Question	Answer	Citation
	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).	
What are the soft caps?	HCPF will implement a cap on Personal Care, Homemaker, and Health Maintenance Activities (HMA) that will cap annual utilization at approximately 19,000 units for HMA (about 13 hours per day), 10,000 units for Personal Care (about 6.8 hours per day), and 4,500 units for Homemakers (about 3 hours per day). There will be an exceptions process for individuals who have a demonstrated need for services above the cap. There is now a Health Maintenance Activities (HMA) Member Documentation Checklist. This guide helps you get ready for your annual assessment(s) by outlining the documentation you should provide to your Case Manager. These documents help show which of your care needs require skilled care services.	Medicaid Sustainability and Colorado's LTSS System | Department of Health Care Policy and Financing Health Maintenance Activities Member Documentation Checklist-January 2026.pdf - Google Drive
Is there a caregiver cap of 56 hours a week?	Not at the time of this open forum. Please keep and eye out for updates on HCPF's Medicaid Sustainability webpage.	Medicaid Sustainability and Colorado's LTSS System | Department of Health Care Policy and Financing
When uninterrupted meal periods are impractical - do we call that a "paid meal break", or do we say that they can eat while on duty, i.e., not clock out while they are eating?	Meal Periods: 30 minutes uninterrupted & duty-free, in shifts over 5 hours (Rule 5.1) • Can be unpaid only for employees completely relieved of duty, and allowed do personal activities • If work doesn't allow uninterrupted meal periods: must allow eating on duty, on paid time	2025 COMPS Order Poster

CDASS & IHSS Question	Answer	Citation
And if an attendant is unable to take a rest break during their shift, should they add 10 minutes to their time at the end of the day?	• As much as practical, meal periods must be at least 1 hour after starting shifts, and 1 hour before ending Rest Periods: 10 minutes should not be added time to the end of the day	
Is O.T. approved for family members, who do more than 40 hrs weekly, though only clock in/out for 8.0 hrs daily?	Once members enter Community First Choice (CFC) family members are able to earn overtime (OT) when they work more than 40 hours a week. For CDASS you will need to account for paying time and a half for anything above 40 hours a week or 12 hours in a day or shift, whichever is greater.	
I am not receiving responses from my case manager. What should I do?	We would highly recommend reaching out to your case manager's supervisor. If that does not work, the Department has an escalations form that you may fill out to obtain additional support.	Escalations form: CR-MEN Webform
Have any decisions been made yet regarding any updates/changes to the CDASS Overspending Protocol Limit?	Not at this time. We encourage anyone interested in the state's monthly Participant-Directed Programs Policy (PDPPC) meeting to receive updates and provide feedback regarding both CDASS & IHSS.	https://hcpf.colorado.gov/participant-directed-programs-policy-collaborative
What is the expected turnaround time for a decision/approval of a Members' submitted documentation for HMA tasks for their new CFC CDASS Budget year?	Case Managers have 5 days to review Health Maintenance Activities (HAM) documentation submitted. If certain tasks exceed the weekly max, supervisor review and approval is needed. And if homemaker, personal care, or health care maintenance soft caps per week are exceeded The HCBS Benefits Division will review requests and respond within **14 business days**.	
Will there be monthly HCPF URUM-type oversight meetings, to keep members informed on the pace of approvals for new	There will not be. We encourage anyone interested in the state's monthly Participant Directed Programs Policy (PDPPC) meeting to receive updates and provide feedback regarding both CDASS & IHSS.	PDPPC Website

CDASS & IHSS Question	Answer	Citation
CFC CDASS Budgets plans, especially if more documentation is needed to justify Tasks as Health Maintenance rather than just Personal Care Tasks?		
How many days do Case Managers have to notify Member if further documentation is needed to substantiate HMA tasks?	Case managers have 5 days to review documentation submitted and notify Member if further documentation is needed.	
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.	Family and Medical Leave Insurance Paid Sick Leave
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. 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.	PPL Website Palco Website
What makes a person EVV Exempt?	The Department of Health Care Policy and Financing (HCPF) allows exemption from Electronic Visit Verification (EVV) in these situations: • Caregivers that permanently live with the Health First Colorado (Colorado's Medicaid	Electronic Visit Verification Attestation of Exemption Form-February 2025.pdf - Google Drive

CDASS & IHSS Question	Answer	Citation
	Program) member receiving services; the most common exemption type, and it expires in 365 days. • Caregivers with extenuating circumstances or do not permanently live with a member; a less common exemption type that must be pre-approved by HCPF and expires in 365 days or less. • Caregivers or members asking for reasonable modifications under the protection of the Americans with Disabilities Act (ADA); the least common exemption type that must be pre-approved by HCPF and does not expire.	
Does CDASS have any sort of employee handbook that Members can use for their attendants to help make employer policies more clear?	CDCO's Information and Assistance (I&A) program would be able to assist you with setting policies and guidelines for your attendants.	I&A Services - Colorado - Consumer Direct Care

Open Forum Questions and Answers for CDASS

CDASS Question	Answer	Citation
Why is there a rate cap of $51.43 in CDASS when it is so hard to find caregivers? **This question is from the February 2025 Member Open Forum session.**	As of October 2025, the maximum pay rate a CDASS employer can set for an attendant is $57.12. 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.	PPL Cost to You Palco Cost to You

CDASS Question	Answer	Citation
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. **This question is from the February 2025 Member Open Forum session.**	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.	Consumer Direct of Colorado
My employees have a hard time getting responses to email inquiries from the FMS, we are wondering if there's any way around that. **This question is from the February 2025 Member Open Forum session.**	Both PPL and Palco can be reached via email and telephone. **Palco Customer Service** Telephone: 501-604-9936 Email: co-cdass@palcofirst.com **PPL Customer Service** Telephone: 1-888-752-8250 Email: ppcdass@pplfirst.com Members and Authorized Representatives can also switch FMS providers every quarter during open enrollment. 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. **HCPF Participant-Directed Programs Unit** HCPF complaint form for CDASS/IHSS: sites.google.com/state.co.us/pdpissues Telephone: 303-866-5638	PPL First Palco First Changing FMS Providers

CDASS Question	Answer	Citation
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? **This question is from the February 2025 Member Open Forum session.**	If your family and friends are okay with filling in as needed on a volunteer basis, they can provide care without being paid. If you want to compensate them using your CDASS budget funds, these individuals will need to be hired as CDASS attendants. You may choose to compensate them privately but be sure that you fully understand employer and employee rights and responsibilities set by the Colorado Department of Labor and Employment. CDASS members must maintain a minimum of two attendants at all times. The maximum number of attendants a member can have is 49. There is no required amount of time that they must work each week, they could just be back-ups and work when needed. Employer taxes may increase if you employ many attendants. Therefore, it is good practice to keep your attendant count accurate by notifying your FMS when an individual no longer works for you.	Two Attendant Policy

Open Forum Questions and Answers for IHSS

IHSS Question	Answer	Citation
When a member does not require an Authorized Representative, does the IHSS Shared Responsibilities Form still need to be completed?	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.	Shared Responsibilities Form Operational Memo
Some IHSS agencies do not allow any overtime hours for relative attendants that have	An IHSS Agency is required to comply with the Fair Labor Standards Act (FLSA). For additional information regarding FLSA,	Colorado Department of Labor & Employment

IHSS Question	Answer	Citation
been approved for members. Is this allowed since the hours are needed?	please visit the Colorado Department of Labor website.	
Will there be any changes to allow family members to provide homemaker services under IHSS?	Yes, after the implementation of CFC in July 2025, regulations were expanded to allow up to 260 hours/year of homemaking care be provided by a Legally Responsible Person.	Community First Choice Option

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
Call: 303-866-5638
Participant-Directed Programs website

Participant-Directed Programs Policy Collaborative (PDPPC)

- The PDPPC is a collaboration between stakeholders and HCPF, focusing on issues related to Consumer-Directed Attendant Support Services (CDASS) and In-Home Support Services (IHSS).
    - Every month on the 4th Wednesday from 1 to 4 p.m. MT
    - November and December meetings occur on the 3rd Wednesday

Consumer Direct Care Network Colorado/Consumer Direct for Colorado
Email: infocdco@consumerdirectcare.com
Call: 844-381-4433
Consumer Direct for Colorado website

Public Partnerships, LLC (PPL)
Email: ppcdass@pplfirst.com
Call: 888-752-8250
Public Partnerships website

Palco
Email: CO-CDASS@palcofirst.com
Call: 866-710-0456
Palco website