

DD Waiver in Crisis: A summary assessment by IDD Advocates

October 2025

The DD Waiver serves the MOST severely Intellectually and Developmentally Disabled (IDD) adults in Colorado. HCPF and the Governor's Executive Order levied an almost 10% cut to the care provided to these adults by Family Caregivers. The enclosed white paper written by advocates of adults with IDD describes the following major points:

- 1. Life-Saving Care Should Never Be Cut Before Non-Essential Services.** IDD adults have extensive medical needs, intellectual impairment, and significant behaviors, and their caregivers are the only people keeping them alive and safe on a daily basis. Cuts to this care should never have come before cuts to non-essential services like Supported Community Connector, Employment Support, Day Habilitation, etc.
- 2. We Are Not Host Homes.** Reducing the FCG rate to match a residential model (Host Home) that is not equivalent is a substantive change to the waiver. Host Home providers are granted respite, support from their PASA, are not required to have natural supports in place to provide skilled care when nurses are unavailable, and do not manage any part of the member's case. Family Caregivers work around the clock with no respite, rely on unpaid natural supports to change g-tubes, titrate oxygen, and provide other skilled care the paid caregivers are not allowed to perform, and are no different than the "staff" in a staffed home working 24/7.
- 3. This Is a 10% Rate Cut, Not an "Alignment."** HCPF has framed this as a rate alignment to avoid the lengthy process of stakeholder engagement, public comment, and CMS approval required by Federal Code for substantive changes to Medicaid waivers including rate reductions and rate methodology changes. HCPF has scrubbed their website and communication log of all notices that would reveal the truth that this cut is a reduction in rates vs. an "alignment."
- 4. HCPF Has Failed To Engage Stakeholders or Accept Public Comment On This Cut.** HCPF has invented a new fictional "Staffed Home," which they would like to define as a home where paid caregivers come in over 24 hours on rotating shifts and no provider lives in the home with the disabled adult. This fictional "Staffed Home" cannot function at the current IRSS rate, endangers member safety with no caregiver in residence when staff misses shifts, and is merely a distraction from the 10% cut to Family Caregivers. They are only accepting comment on this definition: No comments are being accepted on the 10% cut or the re-defining of Family Homes as Host Homes to reduce them to the lower rate.
- 5. Family Caregivers Provide Significant Budget Savings.** We provide the highest quality care at the lowest cost to the state, keeping our vulnerable adults in the community. Cutting us just forces our loved ones into more restrictive settings at a higher cost.

The IDD community will not be silent about this targeted 10% cut to the only care keeping these vulnerable adults alive. Other non-essential services should have been targeted instead of Family Caregivers.