

Changes to CFC Personal Care Protective Oversight & Personal Care in Sirius Care

Client profile updates begin this week - August 18, 2026

PLEASE READ - THIS IS A SIGNIFICANT CHANGE

- **Separate service in Sirius Care:** Protective Oversight within CFC Personal Care will appear as a separate service for clients whose DCSC has been updated by Case Coordination.
- **7-hour weekly Task Standard:** CFC Personal Care Protective Oversight is limited to 7 hours per week per client unless additional Protective Oversight has been approved through the applicable exception process.
- **Client-level standard:** The 7-hour standard applies to the client, not to each individual provider, and is specific to Protective Oversight within CFC Personal Care/DCSC.
- **No overlapping task time:** Protective Oversight will no longer be selected from the regular Personal Care task list and may not be logged at the same time as another Personal Care task.
- **Task time and frequency will be shown:** Personal Care tasks will begin showing the authorized time allowed for each task and the frequency at which the task is expected to be performed.

Why you are seeing these changes

Colorado has implemented updated Direct Care Services Calculator (DCSC) task standards for Personal Care, Homemaker, and Health Maintenance Activities under Community First Choice (CFC). Case Managers use the DCSC to determine the amount of attendant support a client needs for covered tasks. PPRS and all service providers must schedule, document, and bill services according to the client's current authorization and DCSC information. These changes are not a PPRS-created reduction in services.

PPRS will begin updating client profiles in Sirius Care this week for clients whose updated DCSC/service information has been assigned or received from Case Coordination. Profiles will be updated client-by-client, so not every client will see the changes at the same time.

Once a client's profile has been updated, PPRS will send an email to the client's parent/guardian letting them know that the Sirius Care profile has changed. Until that notification is received, providers should continue following the services and tasks currently displayed for the client. After the update, all parents, caregivers, and service providers must follow the new service lines, authorized task times, frequencies, and CFC Personal Care Protective Oversight requirements shown in Sirius Care.

IMPORTANT FOR AUGUST 2026

- **For the remainder of August 2026**, the newly separated CFC Personal Care Protective Oversight service will show 0 remaining hours in Sirius Care for affected clients because the Protective Oversight time available for August has already been used earlier in the month.
- **This does NOT remove** the client's remaining authorized Personal Care hours. Any remaining Personal Care hours for August will continue to be available.
- Remaining Personal Care must be provided and documented according to the authorized time allotted to each task and the frequency shown in the client's updated Sirius Care profile.
- Beginning in September 2026, CFC Personal Care Protective Oversight will be tracked separately according to the client's authorized amount and applicable DCSC requirements.

1. CFC Personal Care Protective Oversight will be a separate service

For clients whose DCSC has been updated, Protective Oversight within CFC Personal Care will appear in Sirius Care as its own service line. It will be removed from the regular Personal Care task list.

Important: CFC Personal Care Protective Oversight time must be logged separately. The same period of time cannot also be logged as bathing, hygiene, dressing, toileting, feeding, mobility, or another Personal Care task.

Example

Correct	Not Correct
30 minutes of CFC Personal Care Protective Oversight is logged as 30 minutes of Protective Oversight.	The same 30 minutes is logged as 30 minutes of Protective Oversight AND 30 minutes of Hygiene.

2. CFC Personal Care Protective Oversight standard: 7 hours per week per client

Colorado HCPF lists Protective Oversight within Personal Care at 1,460 units annually, which equals approximately 7 hours per week. This is a client-level standard - not 7 hours for each parent, caregiver, or provider.

- The 7-hour standard discussed in this notice applies specifically to Protective Oversight within CFC Personal Care/DCSC. It is not a 7-hour limit on all Personal Care services, and this notice is not establishing a 7-hour limit for other Medicaid services or programs that may use similar supervision or oversight terminology.
- If the client needs more than the standard amount of CFC Personal Care Protective Oversight, Case Management must address the need through the applicable exception/review process and the additional time must be authorized.
- PPRS cannot independently add CFC Personal Care Protective Oversight hours beyond the client's authorization.
- Parents, caregivers, and all other providers should follow the current authorization shown for the client in Sirius Care.

3. What qualifies as CFC Personal Care Protective Oversight for PPRS clients

Based on the DCSC implementation direction provided to PPRS by Case Coordination, CFC Personal Care Protective Oversight must be tied to an authorized safety protocol for the client. The six protocols provided to PPRS are:

Protocol	Plain-language description
Elopement	Risk of leaving a safe area or designated supervision area.
Physical Aggression	Behavior that creates an immediate risk of physical harm to the client or another person.
Extreme Behaviors During a Meltdown	Severe behavior during a meltdown that creates an immediate safety risk and requires intervention.
Seizure	A documented seizure-related safety risk requiring the authorized level of oversight/intervention.
Self-Injurious Behavior (SIB)	Behavior in which the client may injure themselves and requires intervention to prevent harm.
Sexually Inappropriate Behavior	Documented behavior creating a safety risk that requires intervention and oversight.

CFC Personal Care Protective Oversight is not general supervision, babysitting, simply being present, or watching a client because the client cannot be left alone. The service must be connected to the client's documented disability-related safety risk and require intervention to prevent harm.

4. Visit notes must describe the behavior/risk and the intervention

When CFC Personal Care Protective Oversight is provided, the visit note should show what occurred and what the provider/caregiver did to prevent harm. Notes such as “watched client,” “supervised client,” or “client cannot be left alone” are not sufficient by themselves.

Better documentation example

“Client attempted to leave the designated safe area. Caregiver maintained line-of-sight supervision, blocked exit, redirected client, and remained with client until the immediate safety risk resolved.”

Not enough by itself

“Supervised client because they cannot be left alone.”

5. Personal Care tasks will show time limits and frequency

As updated DCSC information is entered into Sirius Care, parents, caregivers, and service providers may begin seeing a specific amount of time allotted to individual Personal Care tasks and the frequency at which each task is authorized.

- Task time means the amount of time authorized for that specific task.
- Frequency means how often the task is expected/authorized to occur, such as per day or per week.
- All providers should document the care actually provided and follow the time and frequency shown for the client.
- Do not increase a task's time or frequency simply to fill a shift.

6. CFC Personal Care Protective Oversight Exception Process - When More Than 7 Hours Is Needed

If the client's assessed need for CFC Personal Care Protective Oversight is greater than 7 hours per week, additional Protective Oversight cannot simply be added by a parent, caregiver, provider, or PPRS. An approved exception/State Review must support the additional authorized time. Under HCPF's current published process, the Case Manager submits the formal Exception Request on the client's behalf. PPRS or another provider may be asked to provide supporting service documentation, but the provider does not approve the exception or independently change the DCSC.

- Protective Oversight within CFC Personal Care above 7 hours per week requires the applicable State Review/exception process for all clients, regardless of age.
- The exception must be supported by an exceptional documented medical, cognitive, behavioral, or safety-related need requiring CFC Personal Care Protective Oversight beyond the established standard.
- The request must be submitted annually and at least 30 days before the requested service effective date.
- Case Management must document why the 7-hour standard is not sufficient, applicable diagnoses or conditions affecting the need, and the frequency, scope, and duration requested above the standard.
- Supervisor or other qualified professional review and signature are required before State Review.
- The Case Manager submits the formal Exception Request on the client's behalf. HCPF reviews the signed DCSC, supporting documentation, and client record; HCPF states the determination is generally completed within 14 business days.
- If approved, HCPF adds the applicable service hours to the DCSC and authorizes the units on the PAR.
- **Until additional CFC Personal Care Protective Oversight is approved and authorized, providers must follow the client's current authorization.**

What to do after the client's profile is updated

- After the parent/guardian receives the PPRS update email, review the service lines and tasks shown in Sirius Care for the client before submitting visits under the updated profile.

- Use the separate CFC Personal Care Protective Oversight service line when it appears for the client.
- Do not log CFC Personal Care Protective Oversight at the same time as another Personal Care task.
- Follow the task time and frequency displayed for each authorized Personal Care task.
- Write visit notes that describe the actual care provided and, for CFC Personal Care Protective Oversight, the qualifying safety behavior/risk and intervention.
- Contact Case Management if you believe the DCSC or authorized time does not reflect the client's needs.

THE SIMPLE VERSION

CFC Personal Care Protective Oversight is now separate from other Personal Care tasks.

The Task Standard is 7 hours per week per client unless additional PO is authorized through the appropriate exception process.

The 7 hours is client-level, not per provider, and this notice applies specifically to Protective Oversight within CFC Personal Care/DCSC.

PO cannot be combined with another task during the same minutes.

PO must relate to one of the six authorized protocols provided to PPRS by Case Coordination.

Other Personal Care tasks must follow the time and frequency authorized on the client's DCSC.

Questions about what is authorized on the client's DCSC or whether an exception is needed should be directed to the Case Manager/Case Coordinator. Questions about how to document authorized CFC Personal Care services in Sirius Care may be directed to PPRS.

Official Colorado Rules & Resources

The following links are provided so parents, caregivers, and service providers can review the source materials directly. These are official Colorado/HCPF resources:

- [HCPF Operational Memo 26-001 - Direct Care Services Calculator and Age-Appropriate Task Standards](#)
Lists Protective Oversight within Personal Care at 1,460 annual units / 7 hours per week and explains use of the CFC DCSC and task standards.
- [HCPF Long-Term Services and Supports Case Management Forms and Tools](#)
Contains current adult and child CFC DCSC tools, age-appropriate task standards, the Protective Oversight and Accompanying Tasks Service Guide, and State Review/Exception resources.
- [HCPF HCBS State Review and Exceptions Requests](#)
Official State Review/exception site, specifically including Protective Oversight within CFC Personal Care.
- [HCPF 2026 Memo Series Communication](#)
Official HCPF memo index showing OM 26-001 and its intended audience, including Personal Care providers, CFC members, IHSS agencies, CDASS members, and CDASS attendants.
- Colorado Code of Regulations - 10 CCR 2505-10, Section 8.400
Colorado Medical Services Board regulations governing HCBS requirements and provider documentation. Readers may also search the current CCR database for 10 CCR 2505-10, Section 8.400.
- [HCPF February 2026 Medical Services Board Rulemaking - HCBS Benefits and Services Requirements](#)