



COLORADO

Department of Health Care
Policy & Financing

303 E. 17th Ave. Suite 1100
Denver, CO 80203

HCBS Base Wage Attestation and Workforce Reporting Frequently Asked Questions (FAQ)

June 2025

Who needs to complete the base wage attestation and workforce reporting?

All Home and Community-Based Services (HCBS) waiver providers rendering eligible waiver services must report compliance with the base wage requirements. Refer to the Qualifying Services for Base Wage Requirement for Direct Care Workers in section [10 CCR 2505-10 8.7418](#) in the Code of Colorado Regulations for the list of services impacted by this requirement. This requirement applies to employees, independent contractors, and relative caregivers performing eligible services.

Who is considered a Direct Care Worker?

Direct Care Worker means a non-administrative employee or independent contractor of a Provider Agency or Consumer Directed Attendant Support Services (CDASS) employer who provides hands-on care, services, and support to older adults and individuals with disabilities in home and community-based settings across the long-term services and supports continuum. The definition of "Direct Care Worker" can be found in [10 CCR 2505-10 8.7402](#).

How do I attest?

Please complete both the Base Wage Attestation Form and Workforce Reporting, which will be emailed to each provider and can be found on the [Direct Care Workforce Base Wage](#) page beginning July 1st of each year.

I have already completed this form in the past, do I need to do it again?

Yes. Providers are required to demonstrate compliance at least annually.



How do I know when I need to complete the base wage attestation form?

Information about base wage attestation requirements and processes is provided through the [OCL Long-Term Services and Supports Newsletter](#), [Operational Memos](#), and [Provider Bulletins](#).

When are the Base Wage Attestation forms due?

The due date for the Base Wage Attestation forms can be found in the [Operational Memos](#), [Provider Bulletin](#), and on the [Direct Care Base Wage page](#).

What happens if I don't submit the Required Base Wage Attestation Forms?

Providers who are **not compliant** with Base Wage Attestation are subject to audit, corrective action, suspension of claims, and/or recoupment.

What information do I need to complete the base wage attestation form?

You will need the following information for your agency: the NPI(s), unique IDs for each worker, hire and/or end date, each worker's employment type, wage, average hours worked, the primary service(s) they perform, and the county where the work is performed.

What information do I need to complete the workforce report?

You will need the following information for your agency:

- the number of waiver members served,
- the types of waivers served,
- the number of current job openings, and
- any benefits offered, if applicable.

What is an NPI/PPID?

NPI (National Provider Identifier): To comply with HB 18-1282, newly enrolling and currently enrolled organization health care providers (not individuals) must obtain and use a unique National Provider Identifier (NPI) for each service location and provider type enrolled in the Colorado interChange. Providers who bill Medicare need to ensure each NPI for Health First Colorado is also enrolled with Medicare.

- Please refer to the [Add an NPI Quick Guide](#) and view the [NPI Fact Sheet](#) if you have any questions.

PPID (Program Provider Identification Numbers): This refers to the Identification Numbers used by the agency for billing Health First Colorado for the services provided.



I don't use Unique Employee IDs, can I write their names?

No, to protect employees' information, **do not use names or initials**. If you do not have a unique employee ID, use a de-identified format (ex. DCW #1, DCW #2, Homemaker #1, PCW #1, PCW#2) to uniquely identify each direct care worker. The unique employee IDs will be used in compliance reviews.

How do I know if I am employing Employees or Independent Contractors?

A worker is an employee when they are paid an hourly rate or a salary and work under the direction and control of an employer. A worker is NOT an employee when they are 1) primarily free from the control and direction in the performance of a service, 2) have a contract for the performance of a service, or 3) are customarily engaged in an independent trade, occupation, profession, or business related to the service performed. For example, host home providers are typically independent contractors and not employees. Please review the [Colorado Department of Labor and Employment \(CDLE\)](#) guidance on independent contractors.

Do I still have to pay the Base Wage if I only hire Independent Contractors?

Yes, both Employees and Independent Contractors who perform [HCBS-Qualifying services](#) are required to be paid the Base Wage or have their Per Diem Wage increased when there is a base wage increase. The Base Wage must be applied to each qualifying service performed by the worker (no averaging or combining wages across qualifying services to meet or exceed the minimum base wage).

What is a Per Diem Wage?

A Per Diem wage is the set amount you pay a worker per day when you do not pay an hourly wage. However, only certain services qualify as Per Diem. The attestation form will allow you to select the Per Diem frequency of daily only.

Which Services are Per Diem?

Per Diem Services are typically those services with unit values of 'Day' and not '15 Minutes', and for base wage reporting will only include: Foster Care Home and Host Home (Children's Habilitation Residential Program waiver), and Individual Residential Support Services (IRSS)/Host Home (Developmental Disabilities waiver).

Can other activities be paid at a lower rate, like travel time?

No. Direct Care Workers who perform any of the base wage qualifying services must be paid at least the base wage. Qualifying services may include travel time and administrative tasks that are involved in the primary service and must be paid at least the base wage.



Do I have to pay at least the minimum base wage for services with a group rate?

Yes. You must pay at least the required minimum Base Wage for all qualifying services.

How do I calculate the Average Hours worked per week?

If your employees do not work a set number of hours each week, you can calculate the average by adding up the hours worked for the last four (4) weeks and dividing by four (4).

How do I know which Primary Service to select?

The dropdown list of Primary Services matches the description listed in the procedure code in the [billing manual](#).

My direct care workers perform more than one primary service, do I need to list each one separately?

Yes. Please use the same Unique ID for the employee on the following row(s) to capture the information for each primary service.

Do we need to include staff who have left between Reporting Periods?

Yes, please include all staff who worked during the reporting period. If they started after the reporting period began, use their hire date. If they left before the period ended, use their termination date.

What happens after I submit my attestation form?

The Department of Health Care Policy and Financing (HCPF) will review and accept or request clarification or corrections. All attestation forms received by HCPF are subject to a compliance review. HCPF's compliance team will reach out to the contact on the attestation form to complete these reviews when necessary. The compliance team will use the unique employee ID on the attestation form during the review. Compliance reviews may result in a corrective action plan, retro payments, and/or a referral to CDLE.

What is a Compliance Review?

A formal compliance/post-payment review is HCPF's administrative oversight process that verifies provider adherence to the base wage requirements. Reviews may cover multiple years to ensure compliance across all applicable base wage increases. Reviews are initiated under two circumstances:

1. When the provider's attestation form does not support compliance, or
2. When a provider has not received a formal review within a set number of years.



Review Purposes:

- *Hourly Base Wage Review*: Confirms that the hourly base wage was increased to meet or exceed the required minimum for the applicable review period.
- *IRSS Per Diem Base Wage Review*: Verifies that IRSS direct care workers paid a daily per diem received a rate increase during the designated review period.

If providers only submit their attestation once a year, how do they show compliance for new employees hired after that?

These employees will be included in next year's submission and must be paid at least the minimum base wage as of their hire date.

Is there an easy way to stay updated on changes to Base Wage?

Yes! Sign up for the [OCL Long-Term Services and Supports Newsletter](#) to stay informed, and also sign up for the [Monthly Notice of Memo Series](#).

I am a Direct Care Worker. If I do not receive the Base Wage, what can I do?

Direct Care Workers can email HCPF at HCPF_WageCompliance_FCU@state.co.us if they are not receiving the base wage. FCU will review the issue and reach out to the Direct Care Worker if additional information is needed.

Direct Care Workers can also learn more about worker complaints at the [CDLE - Demands, Complaints, Responses, and Settlements webpage](#).

Where can I find the regulations about the base wage?

The regulations regarding the base wage requirement are in [10 CCR 2505-10 8.7418](#).

Where do I find more information about the base wage?

Review the [Direct Care Workforce Base Wage](#) page for detailed information. Please send any questions to hcpf_basewage@state.co.us.

