



OPERATIONAL MEMO

Title: Updated Guidance on HCBS and CFC Provider Training Requirements	Topic: HCBS
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HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to inform Home- and Community-Based Services (HCBS) and Community First Choice (CFC) provider agencies of updates to available training resources and clarify current training expectations.

This includes informing these providers of a new training curriculum, which includes existing trainings as well as a new training. This memo clarifies guidance provided in March 2026 after HCPF received questions and heard concerns from providers.

The memo explains 1) what's changing, including removing the requirement to upload specific certificates for certain trainings as part of provider enrollment and revalidation processes, 2) that organizations may utilize external trainings for person-centered practices training, 3) how to access the trainings in the curriculum, 4) who is required to complete the trainings, and 5) how to demonstrate successful completion of the trainings.

Information:

Background

HCBS and CFC provider agencies are required to ensure training in key topic areas, including:

- **Person-Centered Practices:** Training on the concepts of the Person Centered Support Plan (PCSP), person-centered practices, and the dignity of risk is required by 10 CCR 2505-10 8.7001.B.2.a.vi and 8.7409.D.1.a.
- **HCBS Settings Final Rule:** Training on the settings rule is mandatory for provider agencies.
- **HCBS/CFC Provider Enrollment and Revalidation Training:** As part of existing initial provider enrollment and revalidation processes, HCBS and CFC provider agencies are required to submit a certificate of completion of the provider training course.

These requirements remain in effect.

What's Changing

The primary update is the availability of **new, free training resources** through the [Colorado LTSS Provider Curriculum in the COTrain learning management system.](#)

This curriculum now includes:

- Existing required training topics
- A new HCBS Settings Final Rule training series
- A Person-Centered Thinking (PCT) training program
- Accessible, web-based modules available at no cost

These trainings are intended to support providers in meeting existing requirements and improving consistency in understanding LTSS expectations.

Person-Centered Practices Training

Providers are still required to ensure that staff are trained in Person-Centered Practices.

- **The training available in COTrain is one option, but not the only acceptable method**

- Providers may continue to use their own Person-Centered Thinking (PCT) training programs or other Person-Centered Practices training to meet this requirement

This ensures flexibility for providers who already have established training processes.

HCBS Settings Final Rule Training

A new HCBS Settings Final Rule training series for providers is now available and replaces prior versions of the training. The new training includes two modules:

1. Module 1: Introduces the rule, explains the rights protected by the rule, identifies where the rule applies, and details the role of provider agencies and direct care workers (DCWs) in upholding the rule.
2. Module 2: Defines rights modifications, identifies criteria that must be documented, explains the process and timelines, and discusses dignity of risk.

Clarification on who must take this training:

- Multiple previous memos, most recently one in 2021, indicated that **direct care workers must complete this training**
- This requirement was reinforced in the previous memo that this memo supersedes (OM26-017)
- We have heard that this requirement has caused confusion in the provider community

Updated guidance:

- **At this time, only provider agency administrators and supervisory staff of Direct Care Workers are required to complete HCBS Settings Rule training**
- The previous training will continue to be accepted for current administrators and supervisory staff who have already taken it
 - This older training did not generate certificates of completion; provider agencies should create their own documentation indicating who has already taken it
- Any existing agency administrator or supervisory staff who have not taken the previous training should complete the updated training outlined in this memo within six months of the effective date of this memo

- All new administrator or supervisory staff should complete the updated training outlined in this memo upon hire
- A certificate of completion for each module should be kept on file for the administrator(s) and supervisory staff demonstrating successful completion of the new training

HCPF will provide additional guidance in the future regarding expectations for other staff, including direct care workers. In the interim, HCPF encourages **direct care staff** to also complete the training, though it is **not required**. To make it easier for staff to participate, the modules have been added to the Direct Care Careers website (see below for details on how to access it).

Other Training on HCBS Settings Rule:

- Case managers will continue to take the mandatory courses on the settings rule available in COLearn, the case management learning management system (LMS).
- Members of the public who wish to view the new trainings may access them on the [HCBS Settings Final Rule website](#) under the header “Training and Educational Resources,” with the caution that they will not receive certificates of completion unless they access the trainings using the instructions below.

HCBS/CFC Provider Enrollment and Revalidation Training

Provider agencies must continue to complete required training related to HCBS and CFC at the time of provider enrollment and revalidation.

Updated guidance:

- Providers **are still required** to complete the enrollment/revalidation training and upload a certificate as proof of completion during the enrollment or revalidation process
- Providers **are not required** to upload a training certificate for either PCT or HCBS Setting Rule trainings as part of the enrollment/revalidation process
- However, providers must still ensure that required trainings are completed and may be asked to demonstrate compliance through other mechanisms (e.g., surveys or audits)

How to access the trainings

The new curriculum and the three trainings it contains may be accessed as follows.

1. Visit the [COTrain learning management system \(LMS\)](#) and create a free account.
 - [Tutorials are available](#) to assist.
2. Access the new Colorado LTSS Provider Curriculum.
 - Either utilize the direct link or search in COTrain for “Colorado LTSS Provider Curriculum” or series ID number 1132995.
3. Access and complete these trainings, if required for the services you provide (see table below).
 - While each of the three overall trainings may be taken in any order, once you start a training, the component modules within that training must be taken in sequential order.
 - [Provider enrollment and revalidation.](#)
 - In lieu of the link, you may search in COTrain for “HCBS/CFC Provider Enrollment Training Course - Colorado” or course ID number 1122865.
 - [Person-centered thinking \(PCT\)](#), if using the version in COTrain rather than an appropriate alternative offered by certified PCT trainers.
 - In lieu of the link, you may search in COTrain for “A Course on Person Centered Thinking by HCPF” or course ID number 1109084.
 - [HCBS Settings Final Rule.](#)
 - In lieu of the link, you may search in COTrain for “Colorado Home- and Community-Based Services (HCBS) Settings Final Rule Series” or series ID number 1131252.
 - Direct Care Workers can also access the HCBS Settings Final Rule training on the [Direct Care Careers \(DCC\) platform](#), which contains an LMS. A free account must first be created to access

the site. The HCBS Settings Rule can be found by searching for “HCBS Settings Rule.”

Providers and staff that are required to take the trainings

Due to provider concerns, HCPF will **not** require new provider enrollments and/or revalidation submissions to include proof of completion of the Person-Centered Practices/PCT or the HCBS Settings Rule trainings. Though these trainings remain required for HCBS and CFC providers.

Providers that have already submitted enrollment applications to the Fiscal Agent need not take action or adjust their submissions based on this new guidance; the Fiscal Agent will review applications based on the date they were submitted and contact providers with any questions or concerns.

The table below identifies, for each training in the curriculum, which provider agencies must take the training, what constitutes proof of completion, and when the training must be taken or re-taken/refreshed.

Training	HCBS & CFC Providers Required to Take the Training	Proof Required	Frequency
HCBS/CFC Provider Training for Enrollment and Revalidation	All provider agencies	Certificate from COTrain must be provided at the time of provider enrollment/revalidation submissions.	Within one year of the date you submit your initial provider enrollment/revalidation, provided that the individual who took the training is still with the provider agency. (Training must be retaken every five years as part of revalidation.)

Person-Centered Practices/PCT	Provider agencies enrolled in the following specialties: Adult Day Services (specialty code 601); Alternative Care Facility (ACF) (specialty code 602); Children's Habilitation Residential Program (CHRP) Habilitation (specialty code 884); Child and Youth Mentorship (specialty code 882); Community Connector Services (specialty codes 634, 883); Day Habilitation, including Specialized Habilitation, Supported Community Connections (SCC), and Prevocational Services (specialty codes 639, 669, 713); Day Treatment (specialty code 641); Independent Living Skills Training (specialty code 654); In-Home Support Services (IHSS) (specialty code 656); Life Skills Training (specialty code 753); Mental Health Transitional Living	Proof of completion for provider agency administrators, supervisory staff, and direct care workers is required to be maintained by the provider. Certificate from COTrain if taking the COTrain version; certificate, screenshot, or other available proof if taking training from another source, such as PCT training offered by the Learning Community for Person Centered Practices, Support Development Associates, or the Colorado Office of Employment First (COEF) Proof of training completion is not required to be provided at the time of provider enrollment/ revalidation submissions.	Training must be taken upon hire and certificates or proof of training completion kept on file. Training does not need to be retaken after initial completion.
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	Home (MHTLH) (specialty code 755); Peer Mentorship (specialty code 754); Personal Care and Homemaker (specialty codes 664, 666); Prevocational Services (specialty code 669); Remote Supports (specialty code 756); Residential Habilitation Services and Supports (RHSS), including Individual Residential Services and Supports (IRSS) and Group Residential Services and Supports (GRSS) (specialty codes 673, 674); Respite for Adults or Children, Unskilled or Skilled (specialty codes 615, 616, 675, 676, 885); Supported Employment (specialty code 679); Supported Living Program (SLP) (specialty code 680); Transitional Living Program (TLP) (specialty code 682); Wraparound Services (specialty code 886); and/or Youth Day Services (specialty code 751). The services listed here		
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	are included in the training requirement whether they are delivered in-person or virtually, via Remote Supports, or via HCBS Telehealth Delivery. Provider agencies enrolled in HCBS specialty types not listed here are still required to apply person-centered practices and may be referred to this training on an as-needed basis.		
HCBS Settings Final Rule	Provider agencies enrolled in the specialties listed above for Person-Centered Practices/PCT, excluding those enrolled exclusively under Respite for Adults or Children, Unskilled or Skilled (specialty codes 615, 616, 675, 676, 885). Provider agencies enrolled in HCBS specialty types not listed above are still required to comply with the HCBS Settings Final Rule and may be referred	Proof of completion for provider agency administrators and supervisory staff is required to be maintained by the provider. Two certificates, one for each module, from COTrain or DCC, must be maintained. Provider-created proof of having taken previously available training will suffice for existing agency administrators and supervisory staff. New agency administrators and supervisory staff	Training must be taken upon hire and certificates or proof of training completion kept on file. Training does not need to be retaken after initial completion.

	to these trainings on an as-needed basis.	should utilize the new training now available in COTrain or DCC. Proof of training completion is not required to be provided at the time of provider enrollment/revalidation submissions.	
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Verification of Training

- Provider agencies should continue to be prepared to show proof of completion of all three trainings, if required for their specialty type, during surveys.
 - This includes proof that staff whose work requires competency in any area(s) covered by the training(s) have taken the training(s), irrespective of the provider agency's last enrollment/revalidation date.
- Surveyors may request proof that provider agencies are meeting these obligations.

Summary

- New, free training is now available through COTrain
- Person-Centered Practices/PCT training requirements remain flexible, providers may use their own training
- HCBS Settings Rule training is currently required for agency administrators and supervisory staff only
- No requirement to upload training certificates for PCP/PCT or HCBS Settings Rule during initial enrollment or revalidation

- HCBS/CFC Provider Enrollment and Revalidation Training has not changed; one certificate per agency is still required to be uploaded as proof of the provider enrollment/revalidation training
- Additional guidance on staff training requirements will be provided in the future

Action To Be Taken:

HCBS and CFC provider agencies must submit proof of completion of the provider enrollment/revalidation training as part of their provider enrollment/revalidation submissions to the Fiscal Agent and must maintain on file proof of completion of the Person-Centered Practices/PCT training and HCBS Settings Rule training, as outlined above.

Definition(s):

None

Attachment(s):

None

HCPF Contact:

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