



OPERATIONAL MEMO

Title: Home and Community-Based Services (HCBS) Base Wage and Compliance Process 2026	Topic: HCBS Provider Reporting Compliance
Audience: HCBS Providers	Sub-Topic: None
Supersedes Number: N/A	Division: Benefits and Services Management Division
Effective Date: July 1, 2026	Office: Office of Community Living
Expiration Date: June 30, 2027	Program Area: N/A
Key Words: Direct Care Workforce, Direct Care Worker, Direct Care Worker Base Wage, Base Wage, Base Wage Attestation, Workforce Reporting, Direct Care Workforce Report, Base Wage-Qualifying Services, HCBS Providers, Home and Community-Based Services, CDASS, Financial Management Services (FMS), Compliance	
Legal Authority: 10 C.C.R. 2505-10 Section 8.7418	
Memo Author: Jasvinder Dhesi	
Operational Memo Number: HCPF OM 26-052	
Issue Date: July 8, 2026	
Approved By: Bonnie Silva	

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 provide Home and Community-Based Service (HCBS) Providers with the requirements, timeline, and instructions for completing the 2026 Base Wage Attestation and Workforce Reporting for Base Wage-qualifying Services.

Even though there is no base wage rate increase in 2026, providers delivering base wage-qualifying services must still complete the attestation and reporting

requirements to demonstrate compliance with direct care worker base wage requirements.

Information:

ALL IMPACTED DIRECT CARE WORKERS (DCWS), INCLUDING EMPLOYEES AND INDEPENDENT CONTRACTORS, MUST BE PAID AT LEAST THE MINIMUM BASE WAGE LISTED BELOW:LOCATION	MINIMUM BASE WAGE (EFFECTIVE JANUARY 1, 2026)
STATEWIDE	\$17.00/hr
CITY OF EDGEWATER	\$18.17/hr
CITY AND COUNTY OF DENVER	\$19.29/hr

Providers must pay the minimum base wage that applies to the location where services are provided.

This minimum base wage requirement applies to all hours worked, including work-related travel, trainings, and meetings.

Providers must pay at least the applicable minimum base wage for each Base Wage-qualifying Service listed below. If a DCW provides more than one service, wages cannot be averaged across services to meet the minimum base wage requirement.

- The following services are subject to the minimum base wage requirement:
 - Adult Day Services
 - Alternative Care Facility (ACF)
 - Community Connector
 - Consumer-Directed Attendant Support Services (CDASS)
 - Foster Care Home
 - Group Home Habilitation
 - Group Residential Support Services (GRSS)
 - Homemaker
 - Homemaker Enhanced
 - Host Home (participants aged 18-20)
 - Individual Residential Support Services (IRSS)
 - In-Home Support Services (IHSS)
 - Job Coaching
 - Job Development
 - Mental Health Transitional Living Homes

- Mentorship
- Pediatric Personal Care
- Personal Care
- Prevocational Services
- Respite
- Specialized Habilitation
- Supported Community Connections
- Supported Living Program
- Workplace Assistance

Providers delivering base wage-qualifying services must submit the 2026 Base Wage Attestation and Workforce Reporting by Aug. 31, 2026. A link to the 2026 Workforce Report and submission instructions will be sent to the email address on file in the Provider Web Portal on July 1, 2026.

CDASS Authorized Representatives and Employers of Record are exempt from attestation requirements. The Financial Management Services (FMS) vendor will submit the required attestation information on their behalf.

HCBS service providers who do not comply with reporting or base wage requirements are subject to audit, corrective action, suspension of claims, and/or recoupment. Compliance reviews conducted by HCPF are separate from the Base Wage Attestation process and require Providers to submit additional documentation to demonstrate compliance with all applicable requirements.

Action To Be Taken:

Providers must complete the 2026 Base Wage Attestation and Direct Care Workforce Report by Aug. 31, 2026.

Definition(s):

Direct Care Workers are defined as non-administrative employees employed by and independent contractors contracted with a Provider Agency or Consumer-Directed Attendant Support Services (CDASS) employer who provide hands-on care, services,

and support to older adults and individuals with disabilities across the long-term services and supports continuum within home and community-based settings.

Attachment(s):

None

HCPF Contact:

If needed, please contact:

HCPF_BaseWage@state.co.us for questions about the attestation process or reporting requirements.

For more information about this requirement, including the Frequently Asked Questions and reporting guidance, visit the Direct Care Workforce Base Wage page at <https://hcpf.colorado.gov/direct-care-workforce-base-wage>.