NORTHEND

COLORADO AGENCY PATH INSIGHT

How to Choose the Right Colorado Agency Path

Colorado separates referral-only placement agencies, Class B personal care agencies, Class A skilled home care agencies, and hospices. The correct path depends on who employs or directs the caregiver, whether any skilled service is offered, and the agency's payer and service model.

Home Care Placement Agency

A placement agency provides only referrals of independent providers to consumers for a fee. It does not employ, direct, control, schedule, or train the referred provider and does not provide skilled home health or personal care directly or by contract.

This model is registered—not licensed or certified—by CDPHE. It requires consumer disclosures, criminal-history screening, liability coverage, fingerprints for owners and managers, and annual registration. The business model must remain genuinely referral-only.

Class B — Personal Care Only

A Class B Home Care Agency provides only personal care services and may not provide any skilled healthcare service. This path fits agencies that employ or contract with caregivers to assist with activities of daily living, supervision, homemaker support, and other non-skilled services within the approved scope.

Class B agencies need compliant assessments, care plans, consumer agreements, personnel files, caregiver competency and training, supervision, quality management, occurrence reporting, complaint handling, infection control, emergency planning, and service records.

Class A — Skilled Home Care

A Class A Home Care Agency provides any skilled healthcare service and may also provide personal care. Skilled services may include nursing, therapy, respiratory care, medication-related services, and other care delivered by licensed or certified professionals under the applicable plan of care.

A Class B agency that wants to add skilled care must submit a new initial Class A application and fee. State licensure, Medicare certification, Health First Colorado enrollment, accreditation, and payer contracting are separate approvals.

Hospice

Hospice is separately licensed under Colorado's hospice rules. It provides coordinated palliative, supportive, and interdisciplinary care for terminally ill patients and families, with services available 24 hours a day, seven days a week in the home, a residential setting, or a licensed facility.

A hospice requires its own governing body, qualified administrator, medical director, interdisciplinary group, clinical program, policies, quality program, bereavement services, and survey readiness. An inpatient hospice facility adds separate building, staffing, and operational requirements.

Questions to consider

- Will the business merely refer independent providers, or employ and direct the caregivers?
- Will services remain non-skilled personal care, or include nursing, therapy, or another skilled service?
- Will the agency pursue private pay, Health First Colorado, Medicare, accreditation, or other payers?
- Which contiguous counties can the agency realistically staff, supervise, and serve?

Placement is not Class B

A placement agency and a Class B agency may both connect consumers with caregivers, but the legal relationship is different. If the business employs, schedules, trains, directs, controls, or provides the caregiver by contract, the placement model may no longer fit.

A physical Colorado office is required

Every HCA serving Colorado must maintain a physical business office in Colorado that can conduct day-to-day agency business. The office must be fixed, protect confidentiality, support safe operations, and be ready for state access and survey. A virtual mailbox alone does not meet this standard.

Administrator and manager qualifications

Class A uses an administrator who must meet professional, education, and experience requirements, including at least two years of healthcare or health-service administration experience with one year of supervisory experience in home care or a closely related program. First-time administrators have required training.

Class B uses an HCA manager who must be at least 21, hold a high school diploma or GED, meet an approved experience or education route, and complete required manager training or document equivalent qualifying preparation.

Application and survey readiness

The process begins with a letter of intent and proceeds through Colorado Health Facilities Interactive (COHFI). The application, fee, insurance or bond, ownership and administrator information, fingerprints, office documentation, geographic service area, policies, forms, and supporting records must align.

Before the initial survey, the agency should be operationally ready to demonstrate its chosen scope through governance records, personnel files, sample consumer records, training and competency evidence, quality and complaint systems, emergency planning, required postings, and a survey-ready office.

Build the agency in the right order

Choose the employment model, services, payer, counties, and office first. Then confirm the category, leadership qualifications, insurance, policies, staffing, records, survey, certification, and enrollment requirements before advertising or accepting consumers.

Planning a Colorado agency?

NorthEnd Consulting helps owners define the correct service scope and prepare the licensing documents and operational structure that match the Colorado agency plan.

Visit northendconsultants.com to discuss your agency plan

Current as of November 2026. Requirements, forms, fees, exemptions, service definitions, COPN rules, and federal enrollment availability may change. Licensing, certification, accreditation, enrollment, and payer contracting are separate decisions controlled by the applicable authorities. This is a general planning resource. NorthEnd Consulting does not guarantee approval.