

# HCPF County Administration 2025 Proposed Rule Revisions

Partner Relations and Administration Division



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Policy & Financing



# Our Mission:

Improving health care equity, access and outcomes for the people we serve while saving Coloradans money on health care and driving value for Colorado.



# What We Do

The Department of Health Care Policy & Financing administers Health First Colorado (Colorado's Medicaid program), Child Health Plan *Plus* (CHP+) and other health care programs for Coloradans who qualify.



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# R7 | County Administration and CBMS Enhancements

- \$25.2 million investment (HCPF R-07 + CDHS R-01) in the county workforce that supports higher wages and more eligibility staff, call center agents and customer service staff
- 10% increase in HCPF pool hours for CBMS for projects that help members retain coverage, support counties, and streamline system processes
- Interactive Voice Response (IVR) call system for members to access information about eligibility and reduce county call center volume
- Permanently funding HCPF's county escalation process
- Implementing an automated solution called Program Area Natural Dialogue Assistant (PANDA) for county staff to navigate and get support on eligibility policies
- Funding an expansion of intelligent Character Recognition (iCR) that will reduce manual data entry from documents received for eligibility.
- Funding to replace specific CBMS software technology that causes delays in county processing
- Funding additional, future SB 22-235 Year 2 model updates that will allow HCPF to set caseload-to-staff ratios for Long Term Services and Supports (LTSS) cases and explore funding needs for dedicated LTSS resources in counties
- Funding additional HCPF resources to improve communications to counties and provide additional on-site support for counties



# Rule Engagements and Timeline



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# Important Dates

Goal: July 1, 2025 Effective Date

## Fall 2024

- County fiscal rule committee

## January 2025

- Bi-weekly walk throughs with counties on program and fiscal rules

## March

- File Rulemaking Notice

## May 2025

- Adopt Rules

## December 2024

- 12/10 Rule overview
- Begin collecting written rule comments

## February 2025

- Continue rule walk throughs
- Advocate, Provider, & Public meetings

## April

- April 30th Hearing Date

## July

- Rules effective



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# Rule Engagement Opportunities

- Feb. 14, 2025 9:00-11:00am (Advocate)
- Feb. 27, 2025 9:00-11:00am (Providers)
- March 6, 2025 9:00-11:00am (General Public/Members)
- March 13, 2025 9:00-11:00am (Advocates)
- March 20, 2025 9:00-11:00am (Providers)

For more information or to register for these meetings please visit:

<https://hcpf.colorado.gov/county-rulemaking>



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# HCPF's County Administration 2025 Proposed Rule Revisions

1.010 Fiscal  
1.020 Programmatic



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# Written Comment Period

- Written comments are the best way to provide direct feedback on the rules. You can submit written comments via the [rule comment google form](#)
- We are asking for initial comments by Jan 11th, this allows us to incorporate comments in to bi-weekly meeting
- Please submit final rule comments by COB April 15, 2025



# What they are

## 1.010 - Fiscal

These rules govern financial operations at the county and ensure compliance with federal and state requirements and general fiscal standards

- These rules were last updated about 12+ years ago

## 1.020 - Programmatic

These rules govern the daily operations of how the counties administer medical assistance, including administrative requirements, but separate from eligibility determination rules

- These rules were last updated 3 years ago



# 2025 Rulemaking

- Considerations from SB 22-235
- Align with HCPF's FY 2025-26 R-07 Decision Item, so counties have resources to implement
- April 30th rulemaking leaves time to update rules if resources the JBC approves look different
- Community/provider feedback on PHE Unwind
- Encourage greater investment in counties to facilitate eligibility and enrollment



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# Guiding Principles

1. Improving Member Experience
2. Addressing federal non-compliance
3. Incorporating lessons learned from the Public Health Emergency (PHE) and PHE Unwind
4. Modernizing fiscal rules
5. Improving state compliance and oversight  
*Streamlining administrative requirements and processes and incorporating subregulatory guidance*

Each rule update is mapped back to these Guiding Principles

**GP = 1, 2, 3, 4 or 5** can be found on each slide



# Initial Draft vs. Final Product

Please note that the 2025 county administration rule redlines are just an initial draft and will look different in their final form

HCPF continues to work with our county partners on editing/revising proposed rule language so these rules can be operationalized

HCPF must also consider fiscal and programmatic implications from any public comments on the draft redlines



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# 1.010 County Administration Fiscal Rules



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# 1.010 General Fiscal Updates

- Removes redundant requirements that were found in both commissioner and director responsibilities
- Updates email addresses, HCPF physical address, statutory cross references.
- Updates for 2 CFR 200 guidance (HHS officially adopted 9/27/24)
- Replaces FASB (for-profit) with GASB (state/local government) pronouncements
- Removes requirements that counties submit unaudited annual financial statements (we receive audited financials)



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# 1.010 Updates

- 1.010.3 Moves approval of Merit Plan to the Admin Rules (1.020)
- 1.010.3 Includes crime insurance in lieu of surety bond (30-10-311(2))
- 1.010.3 Clarifies the county directors are responsible for administering the program while minimizing over expenditure to the allocated appropriation
- 1.010.3 Approved budget is submitted to DOLA by Jan 30 instead of HCPF by Feb 15 (29-1-108)

GP = 2,4 and 5





# 1.010 Updates

- 1.010.4 Clarifies the county directors are responsible for activities/functions performed by county-wide staff such as property management/physical inventory
- 1.010.4-1.010.5 Delegates some county director or treasurer duty to designee
- 1.010.9 Expands procurement cards program to include credit cards
- 1.010.10 Removes unnecessary administrative burden like submitting a cash reconciliation in March when cash from the prior year is still moving

GP = 2,4 and 5



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# 1.010 Updates

- 1.010.12 Removes trust responsibilities (under 10 CCR 2505-10, section 8)
- 1.010.14 Prior approval for expenses needing HCPF written approval
- 1.010.14 Includes allowable versus unallowable costs guidance, including clearly specifying client-related costs as unallowable
- 1.010.14 Includes a process for hospital cost-sharing related to eligibility determination agreements with counties

GP = 2,4 and 5



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# 1.010 Updates

- 1.010.15 Includes procurement section including subrecipient responsibilities
- 1.010.23 Moves Audits by HCPF to the Admin Rules (1.020)

GP = 2,4 and 5



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# Sections with no changes in 1.010

- 1.010.6 Chart of Accounts
- 1.010.7 General Ledger
- 1.010.8 Financial Statement Reporting
- 1.010.11 Accounts Receivable
- 1.010.13 Revenue
- 1.010.16 Contracts
- 1.010.17 Travel
- 1.010.18 Office Space



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# Sections with no changes in 1.010

- 1.010.19 Cost Accounting
- 1.010.20 Random Moment Sampling
- 1.010.21 Countywide Cost Allocation Plan
- 1.010.22 Single Audit by an Independent Certified Public Accountant
- 1.010.24 Conflict of Interest
- 1.010.25 Political Activity
- 1.010.26 Confidentiality
- 1.010.27 Misappropriations



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# 1.020 County Administration Programmatic Rules



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# 1.020: Clarifying Roles and Responsibilities

- Clarifies HCPF's status as the single state agency
- Clarifies HCPF is the only entity that can set statewide policies and systems and that those authorities cannot be delegated
- Clarifies that HCPF has delegated specific duties to counties and only those duties
- Clarifies that counties are bound by the rules and regulations of HCPF

GP = 2 and 5



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# 1.020.2 County Board Administrative Responsibilities

- Modifies our current intergovernmental agreement between the state and the county to meet federal requirements (42 CFR Part 431.10):
  - Responsibilities of the County and State, including the requirement for fair hearings
  - Quality control and oversight by the State Department
  - Assurances that the County Department will conduct fair hearings, comply with the State oversight and compliance requirements
  - Business process standards as dictated by the State (SB 22-235)
  - Performance metrics, targets and deliverables for the county's share reimbursements as provided by the State related to those performance metrics, targets, and deliverables

**GP: 2 and 5**



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# Implementation of 1.020.2

Delayed implementation - July 1, 2026 and will then be on a 3 Year Cycle

- Allows for a full year of engagement on what the new agreement will look like
- Aims to have a final draft completed by Dec 2025
- Will replace the Incentives contract signatures on the new 3 year cycle



# 1.020.2 (Cont.)

- Requires the county to inform HCPF when a new director is appointed within 5 business days
  - Also includes a new requirement that the new director complete orientation with HCPF within 6 months
  - Requires HCPF to reach out to the new director with 5 business days

GP = 5



# 1.020.4 Staffing Standards and Requirements

- Counties may contract with other County Departments for the term-limited assignments
  - Must have signed agreement in place between those County Departments, and those staff under contract are merit-based, governmental employees
  - Any signed agreement must include record retention requirements, cost-sharing, and quality assurance expectations
- New requirements for Personnel screenings
  - Must include criminal background checks on all staff with access to any State-owned Information Technology System
- Clarifies county staff must be trained using training that is provided by or approved by SDD

GP = 1,2 and 5



# 1.020.5 and 1.020.6 Statewide Automated Systems and Confidentiality

- Adds a requirement that counties must seek permission from the State to grant access to any individual outside of the County Department
  - This includes other entities within the county that act independently of the County Department.
- Adds new language around member opt-out for encrypted emails

GP = 1,2 and 5



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# 1.020.8 Civil Rights Procedures

- Clarifies the requirement for language translation services into rule (previously in memo)
  - Clarifies the counties to inform individuals that language services are available and how individuals can access services
  - Clarifies the language services must be free of charge

GP = 1, 2 and 5



# 1.020.9 Customer Service

- Clarifies the State can set Customer Service Standards
- Clarifies expectations for modalities of member engagement (in-person, phone, mail, fax, etc.) and public posting of office hours and closure dates
- Adds the requirement for counties to appoint a Customer Relations Coordinator
  - Advocates frequently request counties provide a direct contact so they can resolve outstanding issues
- Adds the requirement for counties to meet expectations and remain in compliance with State Department Complaints and Escalations Process

GP = 1,2,3 and 5



# Implementation of 1.020.9

Implementation date of July 1, 2025

## Customer Service Standards

- Will promulgate standards for county call centers and non-county call center operations for customer service
- Need to partner with counties to set those standards

## Customer Relations Coordinator

- Additional guidance to come Q1 2025
- Should leverage existing county process; may be an existing staff or new staff
- HCPF to provide new public postings
- See Arapahoe County's [example](#)



# 1.020.11 County Department Collaboration with External Entities to Facilitate Eligibility and Enrollment (new section)

County Department shall be directed to enter into formal agreements with hospitals within the county. The agreements must include:

- Contacts specific to the parties of the agreement
- Defined roles and responsibilities
- Workload and performance expectations
- If the hospital opts-in, mechanisms for cost-sharing between the State Department, County Department and the Hospital System(s) that facilitate onsite placement of County Department staff in Hospital System(s)

Requires collaboration with nursing facilities and case management agencies (CMAs)

- Through internal controls on what collaboration should look like with these entities

GP = 1,3 and 5



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# Implementation of 1.020.11

Delayed implementation - January 1, 2026

- HCPF will provide support to counties attempting to collaborate with hospitals
- HCPF may give additional time through June 2026 if needed

NEW! FY 2025-26 Collaboration Incentive

- This Incentive will provide funding if the county is successful in signing agreements by June 2026 or hospitals have opted out
- Also includes CMA/NF collaboration



# 1.020.13 Audits, Quality Assurance, and Reviews by the State Department

- Adds new Review types to allow HCPF to conduct reviews on specific issues
  - Performance Reviews (MAP)
  - Review of Training across counties to ensure all employees are consistently up to date on processing guidance and rules
  - Review of all escalations to identify patterns and areas, both across the state as well as within counties, where there may be areas for improvement

GP = 1,2,4 and 5



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# 1.020.14 Non-Compliance Findings and Action Plan Processes

- Adds a new type of informal non-compliance notice that can be issued prior to a Management Decision Letter, in specific circumstances
- This new type of notification, called a “Notice of Compliance Concerns” is intended to be used where a formal notice is not necessary
- The informal notice is intended to be less punitive, but still allow for compliance issues to be addressed
- Added based on county feedback

GP = 5



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# 1.020.14 Sanctions

Allows HCPF to delay payment of local share reimbursement (County Incentives) if a county remains out of compliance

- Scenario: county earns 75% of their County Incentives payment for meeting benchmarks/deliverables, but is on a non-compliance notice for program integrity activities HCPF would withhold a portion or all of that payment until county gains compliance
- HCPF would not retain any portion of the payment, just delay payment until compliance is achieved
- Addresses an inequity issue in current fiscal sanctions (county director salary)

GP = 2 and 5



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# Questions?



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# Thank You



# Contact Information

Partner Relations and Administration  
Division

[HCPF\\_CountyRelations@state.co.us](mailto:HCPF_CountyRelations@state.co.us)

[County Relations Webform](#)

[County Administration Webpage](#)

[County Administration Rulemaking Webpage](#)



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