

HCPF County Administration 2025 Proposed Rule Revisions

Partner Relations and Administration Division



COLORADO
Department of Health Care
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.



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Agenda

- Review of Guiding Principles
- Where we are in the process
- Review of redlines and county feedback
- Next Steps

Purpose of Meeting

The purpose of this meeting is to give HCPF and county partners an opportunity to have a working session on each section of the proposed 2025 county administration rules

Because of open meeting laws, any member of the public can participate. However, members of the public will only be allowed to provide comment during the public comment period of the meeting.

We also have additional meetings scheduled for providers, advocates and the general Public



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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



County 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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1.020.1.2 Purpose and Scope

2. State Department ~~County~~ Responsibilities

As the federally designated single state agency, per 42 CFR Part 431.10(b), for the Medical Assistance Program in Colorado, the Colorado Department of Health Care Policy and Financing (State Department) is charged with administering and supervising the Medicaid State Plan. As the single state agency, the State Department issues rules and regulations that are binding on the County Department. Additionally, the State Department must exercise appropriate oversight over eligibility determinations, appeals and overall County Department operations. The State Department is federally prohibited from delegating to anyone other than its own officials, the authority to supervise the Medicaid State Plan and its delegation of eligibility and enrollment activities, or to develop or issue policies, rules, and regulations on program matters. The State Department has the sole authority to set statewide policies, rules and regulations and manage State Information Technology Systems.

GP = 2 and 5

1.020.1.3 Purpose and Scope

3. County Department Responsibilities

The County Department is charged with the responsibility for administering all Medical Assistance Program eligibility and enrollment that were delegated by the State Department, in accordance with regulations and rules established by the State Department. ~~activities in accordance with rules established by the State Department.~~ The County Department will only be reimbursed for payments under the Colorado Medical Assistance Act and the administration of these programs if said programs are administered in accordance with the State Department rules as well as all other applicable federal, State, and local laws, rules and regulations. Per 42 CFR Part 431.107(b)(ii), the County Department is responsible for ensuring it complies with the regulations and rules of the State Department.

GP = 2 and 5



1.020.2. County Board of Human/Social Services Administrative Responsibilities

1. Formal Agreements between the County Board and the State Department

- a. To comply with 42 CFR Part 431.10(d), the County Board shall enter into a formal intergovernmental agreement with the State Department that authorizes the delegation of eligibility and enrollment activities for Medical Assistance Programs to the County Department. This agreement shall be in place for the duration of the State Department's delegation of eligibility and enrollment activities to the County Department.
- b. The formal intergovernmental agreement between the County Board and the State Department shall include:
 - i. The relationships and respective responsibilities of the County Department and State Department, including but not limited to the respective responsibilities to effectuate the fair hearing as dictated by the federal government and State Department
 - ii. Quality control and oversight by the State Department, including any reporting requirements needed to facilitate such control and oversight
 - iii. Assurances that the County Department, to which the State Department has delegated authority to determine eligibility or conduct fair hearings, will comply with the State Department oversight and compliance requirements and monitoring

GP = 2 and 5



1.020.2.1 County Board of Human/Social Services Administrative Responsibilities

- iv. For appeals, procedures to ensure that individuals have notice and a full opportunity to have their fair hearing conducted by either the County Department or State-level appeals.
- v. Business process standards as dictated by the State Department; these business process standards shall ensure equitable administration by all County Departments as required per 42 CFR Part 431.50(b)
Business process standards shall be updated annually and issued through sub-regulatory guidance
- vi Performance metrics, targets and deliverables for any local share reimbursements, if any, as provided by the State Department
Performance metrics, targets and deliverables shall be updated annually and issued through sub-regulatory guidance

GP = 2 and 5



1.020.2.3 County Board of Human/Social Services Administrative Responsibilities

4. County Board Responsibilities

a. Appoint a County Department Director

i. The County Board shall appoint a County Department Director or shall appoint someone acting in the capacity of a director. At no time will the County Department be without the services of a County Department Director or an Acting Director.

ii. Upon appointment of a County Department Director, or someone acting in the capacity of the director, the County Board shall formally notify the State Department, within five (5) business days of the effective date of the appointment, of the individual appointed and contact information, including phone and email addresses. Notification should be emailed to hcpf_countyrelations@state.co.us

iii. The State Department will contact the appointed individual within five (5) business days of receiving the notification to provide support around the County Department Director's responsibilities for Medical Assistance administration.

iv. The County Board shall ensure the County Department Director completes an onboarding training for Medical Assistance administration, to be provided by the State Department, within six (6) months of the effective date of appointment.

GP = 5



1.020.3.1 County Department Director Administrative Responsibilities

b. Continuity of Operations

1. To ensure the Continuity of Operations for Medical Assistance eligibility and enrollment, the County Department Director shall be charged with drafting and implementing a Continuity of Operations Plan (COOP). The COOP shall address how the County Department continues to provide eligibility and enrollment services in the event of a disaster, public health emergency, or other emergency situation.
2. The COOP shall meet the minimum requirements dictated in the Colorado Information Security Policies.
3. The COOP is not required to be submitted to the State Department but is subject to review during any compliance review as found in 10 CCR 2505-5 1.020.13.

GP = 5



1.020.3.1 County Department Director Administrative Responsibilities

c. County Department Contacts

By January 5 and July 5 of each calendar year, the County Department shall provide the most recent, updated contact information, including names, phone numbers and email addresses, for certain County Department employee types to the State Department. The employee types include contact information for the County Department Director, Deputy Director(s) and/or Eligibility Director(s) and other critical personnel determined by the State Department.

GP = 5



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1.020.3.1 County Department Director Administrative Responsibilities

dg. Reporting from the County Department to the State Department (CRS 25.5-1-118)

The County Department is required to report any information to the State Department, at such times and in which manner and form the State Department may from time to time direct. This includes any and all information that is pertinent to the County Department's role in Medical Assistance eligibility and enrollment.

GP = 5



County 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



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HCPF Written Comment Reviews

For every written comment received, HCPF will document what actions were taken or not taken within the written comment tracker and on what date. These actions are:

- **Approved** - HCPF accepted the suggested edits/revisions
- **Partial Approval** - HCPF accepted a portion of the edits/revisions, with reason for partial approval
- **Rejected** - HCPF rejected the suggested edits/revisions, with reason for rejection
- **Partial Rejected** - HCPF rejected a portion of the edits/revisions, with reason for partial rejection
- **Pending HCPF Leadership Review** - The suggested edits/revisions require review and approval by HCPF Leadership
- **Pending Federal Clarification** - The suggested edits/revisions require federal clarification and are pending until clarification is received
- **Pending State Clarification** - The suggested edits/revisions require state clarification and are pending until clarification is received



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County Written Comments - 1.020.1, 1.020.2 and 1.020.3

None Received, but comment period still open
through 4/15





Questions?



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Next Meeting

- Fiscal Rules

- Wednesday, January 15th, 9-11am

- 1.010.1 Definitions
- 1.010.2 Purpose and Scope
- 1.010.3 Board of County Commissioners
- 1.010.4 Financial and Budgetary Responsibilities of the County Department Director
- 1.010.5 County Treasurer
- 1.010.6 Chart of Accounts

- Program Rules

- Wednesday, January 22nd, 9-11am

- 1.020.4 County Personnel/Staffing Standards and Requirements
- 1.020.5 Colorado Department of HCPF Statewide Automated Systems
- 1.020.6 Confidentiality





Public Comments



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Contact Information

Partner Relations and Administration Division

HCPF_CountyRelations@state.co.us

[County Relations Webform](#)

[County Administration Webpage](#)

[County Administration Rulemaking Webpage](#)



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