

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
- Discussion on Business Process Standards definition
- 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



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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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1.020.4 County Personnel/ Staffing Standards and Requirements (page 63)

1. Responsibility for Merit-Based, Governmental Staff

- a. The County Department Director, with the approval of the County Board, shall appoint such staff as may be necessary to administer Medical Assistance within the County Department. Such staff shall be appointed and shall serve in accordance with a merit system for the selection, retention, and promotion of the County Department employees as described in the county merit system.
- b. The salaries of the members of such staff shall be fixed in accordance with the rules and salary schedules prescribed by the county merit system.
- c. The county merit system shall conform to the Code of Colorado Regulations, 9 CCR 2502-1, Volume 2, and 5 CFR 900.601. 9 CCR 2502-1, Volume 2 (2021) and 5 CFR 900.601 (2021) are hereby incorporated by reference into this rule.
- d. The County Department Director may contract with other County Departments for the term-limited assignment of staff from those County Departments, so long as there is a signed agreement in place between those County Departments, and those staff under contract are merit-based, governmental employees
- i. Any signed agreement shall address performance standards and expectations, record retention requirements, cost-sharing, quality assurance expectations. —
- e. Every two years beginning January 1, 2025 each county shall submit to the State Department a certification that the above criteria are being maintained by the County Department. This certification must be received as prescribed by the State Department on or before January 1 of every other year beginning January 2025. The certification must be validated by the county board of commissioners or designee.



1.020.4 County Personnel/Staffing Standards and Requirements (page 63-64)

2. Staffing Safeguards for State-Owned Data

- a. Personnel screenings are required for all employees of the County Department; personnel screenings must include criminal background checks on all staff with access to any State-owned Information Technology System in which either the State or the County Department grant access to County Department personnel.
- b. When hiring an employee of the County Department, the County Department Director shall ensure that employees being hired from other County Departments have not had access to any State-owned Information Technology System terminated by those County Departments.
 - i. If a County Department has terminated access to any State-owned Information Technology System for any current or previous employee for reasons including, but not limited to, fraud or conflicts of interest, the County Department is prohibited by the State Department from granting access to those State-owned systems.

1.020.4 County Personnel/ Staffing Standards and Requirements (page 64)

3. Responsibility for Staff Completion of Training

- a. The County Department Director or designee shall ensure staff appointed to fulfill duties relating to the administration of Medical Assistance complete adequate initial hire training. Adequate initial hire training shall be completed prior to the County Department allowing the initial hire to conduct eligibility determinations or other related duties independently of any staff who previously completed initial hire training.
- b. The director shall also ensure staff appointed to fulfill duties relating to the administration of Medical Assistance complete ongoing training specific to Medical Assistance on an annual basis.
- c. Adequacy of initial and ongoing training is determined by the State Department and the Staff Development Division and is reflected by new hire training plans and ongoing, mandatory trainings as communicated by the State Department.
- d. The County Department Director or designee shall ensure that required training is obtained through the Staff Development Division (SDD) or an SDD-certified county trainer and that all County Department-created training has been submitted and approved by the State Department and the SDD. This includes the formalized trainer certification process by the SDD, which consists of initial certification for new County Department trainers and ongoing recertification of those trainers.

1.020.4 County Personnel/ Staffing Standards and Requirements (page 64)

- e. Required Trainings provided by the State Department, SDD or SDD-Certified Trainers
 - i. Staff appointed to fulfill duties relating to the administration of Medical Assistance and who have direct contact with applicants and enrollees or supervise those staff who have direct contact shall complete, on an annual basis, State Department-provided trainings relating to civil rights/non-discrimination and disability/cultural competency.
 - ii. Trainings related to eligibility determination, the eligibility determination system and other trainings as communicated by the State Department. These trainings shall be considered mandatory trainings and shall be completed within the timeframe designated by the State Department.

1.020.5 Colorado Department of HCPF Statewide Automated Systems (page 64-65)

1. Required Use of Statewide Automated Systems

- a. The County Departments shall use the State of Colorado automated statewide financial, member and/or provider information systems. These systems are designed to collect and store financial records and program data; assist with eligibility and payment determinations; generate forms and reports; create electronic benefit authorizations; and add to, delete, or make changes to the information on file.
- b. The County Department shall seek prior approval from the State Department to grant access to any individual and/or entity outside of the County Department; this includes other entities within the county that act independently of the County Department.

1.020.6. Confidentiality (page 66-67)

- No Changes in the redline document
- HCPF will be adding language in the next draft of redlines that allows for members to request non-encrypted emails, if they use the state-approved form and that is documented in case comments and the member's file

Business Process Standards Definition

(Carry over from 1/8 program rules meeting)

HCPF's draft proposed definition:

A business process standard is a set of defined expectations to achieve a specific outcome(s), developed in collaboration between the State Department and County Departments and approved by the State Department. Business process standards establish a consistent way of performing a specific business activity across County Departments, ensuring uniformity in how tasks are completed for **public and** medical assistance programs that aim to optimize efficiency and effectiveness within that process.

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 on Rules Covered Today

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



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Questions?



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Next Meeting

- Fiscal Rules

- Wednesday, January 29th, 9:00-11:00 am

- **County Request:** 1.010.4(7) – Budgetary Responsibility, section (b) Annual Budgets and (d) Quarterly Budget Reports.
- 1.010.7 General Ledger
- 1.010.8 Financial Statement Reporting
- 1.010.9 Accounting and Fiscal Internal Control
- 1.010.10 Balance Sheet Accounts
- 1.010.11 Accounts Receivable
- 1.010.12 Fixed Assets

- Policy Rules

- Monday, February 10th, 1:00-3:00pm

- 1.020.7 Non-Discrimination
- 1.020.8 Civil Rights Procedures
- 1.020.9 Customer Service
- 1.020.10 Communications



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Public Comments



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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