

**You** 12:03 PM

[https://docs.google.com/document/d/1a2kaoc4Cs8x7GMTkLPM5cAOwqSNGF1TUXggprv1Xb\\_4/edit?tab=t.0](https://docs.google.com/document/d/1a2kaoc4Cs8x7GMTkLPM5cAOwqSNGF1TUXggprv1Xb_4/edit?tab=t.0)

**Amy Petre Hill** 12:07 PM

Josh and Danielle, when can we provide comments or questions? Can we go section by section?

**You** 12:09 PM

[https://docs.google.com/document/d/1a2kaoc4Cs8x7GMTkLPM5cAOwqSNGF1TUXggprv1Xb\\_4/edit?tab=t.0](https://docs.google.com/document/d/1a2kaoc4Cs8x7GMTkLPM5cAOwqSNGF1TUXggprv1Xb_4/edit?tab=t.0)

**Jesi Antonucci** 12:16 PM

Why wouldn't we just update the rule when we have defined the process instead of putting verbiage that we will be defining the process in the future?

**Amy Petre Hill** 12:20 PM

I think stakeholders would also want to provide feedback on definition of customer service definitions.

**Heather Durosko** 12:21 PM

when is the meeting next week?

**You** 12:21 PM

Monday Afternoon

**Betsabet Samarripa** 12:21 PM

I would be interested in helping develop a definition for customer services

**Amy Petre Hill** 12:23 PM

So that language would be again open to discussion when it is put through rulemaking, right?

**Melissa Moore** 12:24 PM

Heather D - good solution

**Amy Petre Hill** 12:25 PM

And who selects who the members or advocates are?

**Melissa Moore** 12:28 PM (Edited)

The word "available" is the qualifier.

**Amy Petre Hill** 12:27 PM

Those lists of available data sources should include member complaints and escalation tickets.

**Amy Petre Hill** 12:29 PM

And only addressing timeliness and accuracy does not address issues of accessibility, and all the elements that make up customer service.

**Melissa Moore** 12:30 PM (Edited)

It's also saying we want to use as much data as we can. Data from counties from state etc. We want to make the best decisions on which standards to focus on and what the goals are that we can.

**Laura Crews** 12:32 PM

They data needs to be pulled from a consistent source that is available to all counties.

**Laura Crews** 12:33 PM

The\*

**Heather Durosko** 12:33 PM

That's what I was going to suggest too Josh

**Heather O'Hayre** 12:31 PM

Counties also don't have access to the HCPF complaint and escalation data

**Amy Petre Hill** 12:36 PM

Pilot project across a few counties of different sizes.

**Recommendation from CCDC:** Add new subsection 1.020.3.6.c.vi:

"Before statewide implementation, proposed Business Process Standards shall be piloted in representative County Departments for a minimum of six months, with evaluation of impacts on processing times, member satisfaction, and accessibility for people with disabilities."

**Justification:** Testing standards before full implementation allows identification and correction of unintended consequences, particularly those affecting vulnerable populations.

**Heather Durosko** 12:38 PM

definitely not a vendor!

**Melissa Moore** 12:39 PM

could it be "joint analysis"

**Melissa Moore** 12:40 PM

Also it is fiscal and resources (e.g. time, equipment, software, labor) all the potential implementation costs (soft or hard)

**Heather Durosko** 12:40 PM

I like Heather O's example of the work finance subpac does to do fiscal analyses of rule changes

**Amy Petre Hill** 12:47 PM

CCDC and CCLP can come back with some more concrete thoughts on how pilots can be included in rule or specific recommendations for the policy memo.

**Melissa Moore** 12:51 PM (Edited)

I think the intent here is not about the 'what' (we know we have to do x, y, z) but it is about not holding us to the 'how' if the 'how' negatively impacts our operations.. process standards are the 'how' we execute the requirements of the rule

**Melissa Moore** 12:53 PM

I think the intent here is not about the 'what' (we know we have to do x, y, z) but it is about not holding us to the 'how' if the 'how' negatively impacts our operations.. process standards are the 'how' we execute the requirements of the rule

I think this language is all about county operations and not getting in there too deep.

**Brenna Spang** 12:56 PM (Edited)

How about something like a documented analysis of the impacts of the change, like a rule package is intended to do? Where it has other program areas impact, fiscal impact, federal impact, county, state impact, etc.

**Melissa Moore** 12:56 PM

The wide variation between counties (size, business models, org structures) necessarily results in a variety of processes (scope/scale) that we each use to execute the rules.

**Brenna Spang** 12:59 PM

Disregard, that is further down and I didn't read ahead :)

**Heather Duroske** 1:06 PM

can we leave the shall but add language about federal directives?

would federal directives that have to be implemented asap then be captured/quantified in the process to update funding model ?

agree, Melissa

**Heather Duroske** 1:09 PM

this is about business process standards we choose to pursue

**Heather O'Hayre** 1:10 PM

Agree with Melissa!

**Amy Petre Hill** 1:13 PM

I would request that the entire chat be provided and considered "comments" on the regulation for purposes of this meeting. Capturing and making them available to the public is a step towards having the "listening logs" Josh stated that he would like to see for these process moving forward.

**Marcella Schieffelin** 1:15 PM

Agree with @Laura Crews

**Melissa Moore** 1:15 PM

Agree Laura. So again this is where selection of which Business Process Standards to go after will be critical.

**Heather O'Hayre** 1:19 PM

Something along these lines - C.ii. Option 1 - leave "shall" included but add language that new federal directives are excluded; Option 2 - if "shall" is removed, revise this statement to "If the Business Process Standards developed determine that funding is necessary but not available, the State Department shall review other business process standards and county expectations to identify capacity and resources necessary to implement this new business process standards."

**Amy Petre Hill** 1:20 PM

I can understand the concern about not having the resources to implement, but doesn't this process flow from HCPF's desire to clarify the relationship between HCPF and Counties? Developing business processes--even if they change--is about a way in which the Counties should interact with HCPF and the members they serve. This observation does not oppose clarification of language.

**Heather Durosko** 1:22 PM

I think that changes depending on the circumstance in the county

**Amy Petre Hill** 1:24 PM

These waivers should be posted so both members and the general public should know about what standards will not applied to a county for a period of time.

**Marcella Schieffelin** 1:27 PM

At the same time, people who may want to relocate from one county to another need to be in the know of what the county is or isn't doing to make an informed choice.

**Heather Durosko** 1:27 PM

Amy, what was the council name?

**Amy Petre Hill** 1:31 PM

The Case Management Community advisory council: it is written into the contracts for CMAs. Members and providers in an area review and provide feedback to the CMA. They are volunteers from the larger community. They can provide both praise and considerations. Check in with Rocky Mountain Human Services to hear how this works for them.

**Heather O'Hayre** 1:29 PM

I will only speak for myself - I want that feedback and even when I reach out to our community partners, we're not getting that feedback directly. I can act on that feedback much quicker if it comes directly to me than if it routes through HCPF first.

**Laura Crews** 1:40 PM

Good point, Heather!

**Melissa Moore** 1:43 PM

Can't we specify the conditions of removing/ending the waiver will be included in the individual agreement with a given county. It may be timebound; peoplebound; resourcebound; or systembound etc.

**David Josselyn** 1:46 PM

for waiver limits; perhaps a foundation to start with would be only one back to back waiver for the same issue. So if you are approved for a waiver due to staffing and that waiver is 2 years (just throwing out the number), then you can only be approved for another waiver for staffing (the same issue) one more time without a break between waivers (not great word smithing there)

**Melissa Moore** 1:47 PM

By definition the reason for a waiver request (people, system, resources) is also the trigger for it's end. So basically we would need to address our reason for the waiver request "as soon as possible/practicable".

**Melissa Moore** 1:42 PM

Re the waiver and public reporting convo: I am all for transparency and accountability. I think reporting our service standard expectations; and goals and metrics and performance for public is great. But I think it can get murky talking about internal business processes with the public. We are all fluid on our processes by necessity. We don't want to share information that without a lot of context will potentially create unnecessary angst and confusion. Additionally, these processes will only represent a small fraction of our overall activity. It is the outputs of our processes (timeliness, accuracy, customer service) that we should be held to account for by the public. And these already are (and can be on key customer service metrics ) the same between all counties so public's basic expectations county-to-county should be the same.

**Amy Petre Hill** 1:47 PM

The idea is not to make additional work for counties. In the BHA/CCBH world, license waivers have to be noted, if there aren't enough staff of a certain kind but no one wants them to close or stop providing services. CCDC and other advocates are asking HCPF for Medicaid Appeal Data (which HCPF has but does not release) and more help desk ticket/software issues so it is clearer to the entire Medicaid ecosystem when the problem is with CBMS, not counties or CMS, or providers.

**Amy Petre Hill** 1:48 PM

Finding way to tell the community when a waiver is needed because of lack of staff will better help with setting realistic expectations for counties.

**Amy Petre Hill** 1:49 PM

Understanding staffing challenges of CMAs has helped them partner with advocates.