



Department of Human Services Tip Sheet: Clients Enrolled in Health First Colorado (Colorado’s Medicaid Program)

Attribution to Primary Care Medical Provider for Individuals in Child Welfare/Foster Care

Attribution Overview

- For the purposes of Health First Colorado (Colorado’s Medicaid Program), attribution is the method used to link Health First Colorado members to their medical home, or Primary Care Medical Provider (PCMP).
- When an individual in child welfare/foster care is enrolled to receive Colorado Medicaid benefits, they are identified as a **Health First Colorado member**.
- Once enrolled, the **Department of Health Care Policy & Financing (HCPF)**:
 - Attributes the member to a **Primary Care Medical Provider (PCMP)**
 - Assigns the member to a **Regional Accountable Entity (RAE)**

Initial Attribution

STEP 1: HCPF will **automatically attribute a newly enrolled member to a PCMP** based on one of these methods.

***NOTE:** If a foster care child is establishing care with a PCMP other than the one they are attributed to, their guardian should contact Health First Colorado Enrollment to change the PCMP.*

Attribution Methods	
Utilization	A member who has received care previously has a claims history. If this utilization history was with a PCMP over the last 18 months, the member will automatically be attributed to that practice. If a child has history with a PCMP, it is ideal to have this child remain with this provider.
Family Connection	A member who has no history with a PCMP will be attributed to a practice if someone in the member’s household has a history with a PCMP, if the practice is appropriate. (For example, an adult will not be attributed to a pediatric practice.)
Proximity	<p>If a member cannot be attributed based on either utilization or family connection, the member will be attributed to the nearest appropriate PCMP in the member’s region. This proximity is based on the address at time of enrollment.</p> <ul style="list-style-type: none"> ● Depending on how the child’s eligibility application was completed, the address will most likely be the child welfare agency of action <ul style="list-style-type: none"> ○ For children on Medicaid at time of child welfare action, children remain with their previous RAE and PCMP. This may not align with the county of action. Direct them to ACC Attribution Fact Sheet and FAQ for details about how attribution works. ○ For children new to Medicaid, if child welfare agency address is on eligibility application, child will be assigned to RAE of child welfare county of action and attributed to a PCMP in the region. <ul style="list-style-type: none"> ● A child placed in foster care may be attributed close to their biological family unless the family changes the address in Peak or with their county DHS.

STEP 2: Once the member has been attributed to a PCMP, HCPF will **assign the member to a RAE** based on location of the PCMP’s practice.

STEP 3: The Health First Colorado enrollment broker will **send a letter notifying the member of the PCMP and RAE assignment.**

Members Have a Choice	
A member, or guardian, may choose a different PCMP at any time by contacting Health First Colorado Enrollment via one of these avenues:	
Online:	Enroll.HealthFirstColorado.com
Phone:	303-839-2120 or 1-888-367-6557 (State Relay 711)

How to Check RAE Assignment and PCMP Attribution for Foster Care Children

How county staff checks a child’s attribution to a Health First Colorado PCMP depends on whether the county is a contracted provider.

County is a Health First Colorado Provider	County is Not a Health First Colorado Provider
Counties that provide services reimbursed by Health First Colorado can apply to become a Health First Colorado provider. This allows the county to look up children on the Provider Web Portal to see where children are attributed. For detailed instructions, view the Provider Web Portal Quick Guide on the Department of Health Care Policy & Financing (HCPF) website, Colorado.gov/hcpf .	For counties not enrolled as a Health First Colorado provider and that do not have access to the Provider Web Portal, county staff should contact the RAE that serves their region. The RAE can access member enrollment and attribution information.

Things to Note

Foster care children can receive **physical health (PH)** services from any Health First Colorado PCMP or medical specialty provider. This does not pertain to **behavioral health (BH)** services.

Fee-for-Service Payment for Rendered Services

The member’s assignment to a RAE does not affect fee-for-service payment for rendered services.

- Fee-for-service in this case refers to the payment a PCMP receives from HCPF for PH services. PH services are not billed to, nor paid for, by the RAE. Only BH services are billed to, and paid for, by the RAE. This means that:
 - A PCMP will be paid for seeing a member even if they are not the attributed PCMP.
 - RAE assignment may affect payment for BH services.

RAE Assignment Determines Payment for Behavioral Health Services

A foster child’s RAE assignment is tied to the attributed PCMP. When making referrals for BH services, it is very important to keep in mind that **the RAE responsible for payment of BH services is determined by location of the attributed PCMP.**

- Only make referrals to BH providers who are contracted with the assigned RAE.
- If this is not possible, contact the RAE for assistance with the referral. (See separate tip sheet with contact info for all RAEs.)

Child Placement Outside of the Member's RAE

If a child is in out-of-home placement outside of their home RAE, **it is best practice for continuity of care to keep the child with their home RAE.**

- HB20-1237 codifies in statute the state's intended policy to keep children in child welfare and juvenile delinquency in the **RAE in which they were originally enrolled** so that vulnerable children maintain services and do not risk delays in services.
- A child's RAE assignment can only be changed with the permission of the legal guardian.
 - If DHS has difficulty accessing services for a child after this move occurs, staff should contact the child's RAE for assistance.
 - It is the responsibility of the RAE to ensure an appropriate provider is located and connected to the child needing services.

If for whatever reason the child changes RAEs, the new RAE the child is assigned to is responsible for ensuring the child's access to any ongoing course of treatment without authorization for a minimum of 60 days.

- Per 42 CFR 438.62, the Department of Health Care Policy & Financing (HCPF) must have in effect a transition of care policy to ensure members with special health care needs have continued access to services during a transition from one RAE to another.
- Members, who in the absence of continued services, would suffer serious detriment to their health, or be at risk of hospitalization or institutionalization, including all members known as pregnant for up to 60 days post-partum, are considered as having special health care needs.

For additional details, refer to the [Transition of Care Policy](#) on the HCPF website, Colorado.gov/hcpf.