



Public Notice

Title XXI Section 1115 Demonstration Extension Application for Colorado Adult Prenatal Coverage In CHP+ (NO. 21-W-00014/8)

Public Comment Period Begins: July 10, 2020 at 8:00 a.m. MDT

Public Comment Period Ends: August 10, 2020 at 5:00 p.m. MDT

Public notice is hereby given that the State of Colorado Department of Health Care Policy & Financing is seeking public comments on a title XXI Section 1115 Demonstration Extension Application ("Demonstration") to support the improvement of health outcomes for low-income mothers and their babies by providing necessary prenatal, delivery, and postpartum care to eligible Medicaid clients who identified as pregnant.

Proposed Demonstration Extension Summary

The Colorado Department of Health Care Policy & Financing ("Department") is submitting a title XXI section 1115 demonstration extension application that requests an extension of the current program from August 1, 2020, through July 31, 2025. The Department plans to submit the Demonstration to CMS at the end of July 2020. The waiver, if approved, will authorize an extension of the federal authority for Colorado to continue to receive title XXI funds for uninsured pregnant women with income from 142% of the Federal Poverty Level (FPL) to 195% of the FPL. The state is not requesting any program changes during the requested renewal period.

Waiver Objectives and Goals

The demonstration population includes pregnant Medicaid expansion clients who would have been covered under CHP+ if not for the expansion (142%-195% FPL). The state targeted this population to achieve three key objectives:

1. Decrease the uninsured rate for pregnant women;
2. Increase prenatal and postpartum care for pregnant women enrolled in the Demonstration;
3. Increase the number of healthy babies born to pregnant women enrolled in the Demonstration

Eligibility

The eligibility criteria included as part of this demonstration from the program's current standards will not change. The demonstration will be open to uninsured pregnant women age 19 and over, with family income above 141% through 195% of the FPL. The demonstration will not have enrollment limits.

Demonstration Hypotheses and Measures

The state is committed to ensuring that there is a robust monitoring and evaluation process in place for this demonstration. During the present demonstration period, August 1, 2015 through July 31, 2020, the following objectives, hypotheses, and methodology were used to determine if Colorado is achieving the demonstration's goals. The table below presents an overview of possible evaluation objectives, hypothesis, and methodology for measurement. It is subject to change and will be further defined as the program is implemented. The example measures are not final and do not represent an exhaustive list of measures that could be used to test each hypothesis.

Table 1. Evaluation Objectives, Hypotheses and Methodology

Hypothesis	Methodology
OBJECTIVE 1: Increase the percentage of pregnant women in the demonstration who received prenatal and postpartum care	
Pregnant women enrolled in the CHP+ demonstration will have a statistically significant increase in prenatal care visits.	Use of claims data, birth certificate data, and HEDIS data to measure prenatal and postpartum care for the women in the demonstration program, as well as, for the pregnant women in CHP+ and Medicaid.
Pregnant women enrolled in the CHP+ demonstration will have a statistically significant increase in postpartum care visits.	
OBJECTIVE 2: Increase the number of healthy babies born to pregnant women enrolled in the Demonstration	
The proportion of babies born to women enrolled in CHP+ and admitted to the NICU will decrease over the five years of the demonstration. ¹	Use of claims data, birth certificate data, HEDIS data and PRAMS data to track the birth weights of newborns and length of stay and time spent in the ICU for babies born to mothers in the demonstration program, as well as, for the newborns born to mothers in Medicaid as a whole.
OBJECTIVE 3: Decrease the uninsured rate for pregnant women	
This objective is included here for completion but was not part of the approved demonstration evaluation design, dated April 26, 2017.	As described in the interim evaluation report, the absence of an appropriate dataset prevented the state from further analysis during the demonstration period.

Estimated Impact of the Demonstration

Historical and projected enrollment trends for Colorado's Combination CHIP program, which is represented as the Separate CHIP population (SCHIP), Medicaid expansion CHIP population (MCHIP), and the Prenatal Demonstration CHIP population, are presented in the following tables. The figures presented in tables 2 through 5 serve to provide an assessment of how the proposed demonstration is expected to impact CHIP program enrollment for the extension period Colorado is requesting. These figures are total annual, unduplicated, person counts.

¹ The original evaluation proposal included this hypothesis, but a corresponding measure was not included in the approved demonstration evaluation design, dated April 26, 2017. Details on this change are included in the Interim Evaluation Report.



Estimated Projections of Annual Enrollment

Table 2. Historical and Projected Enrollment Figures by Category

	Total Combination CHIP Enrollment by Year	SCHIP Plan Enrollment by Year	MCHIP Plan Enrollment by Year	Total 1115 Demonstration Enrollment by Year (142%-195% FPL)
FFY 2015	107,800	52,346	53,747	1,707
FFY 2016	117,471	54,549	61,103	1,819
FFY 2017	137,145	69,603	65,503	2,039
FFY 2018	147,012	81,893	62,854	2,265
FFY 2019	141,221	80,967	57,995	2,259
FFY 2020	135,265	76,032	57,088	2,145
FFY 2021	137,874	77,519	58,121	2,234
FFY 2022	140,290	79,121	58,856	2,313
FFY 2023	140,290	79,121	58,856	2,313
FFY 2024	140,290	79,121	58,856	2,313
FFY 2025	140,290	79,121	58,856	2,313

Table 4. Annual counts of individuals expected to be enrolled in the demonstration, assuming that the proposed demonstration is implemented.

	Annual counts of individuals expected to be enrolled in the demonstration by year
FFY 2021	2,234
FFY 2022	2,313
FFY 2023	2,313
FFY 2024	2,313
FFY 2025	2,313

Table 5. Annual counts of individuals that would be expected to enroll in CHIP, if the proposed demonstration is not implemented, based on historical program trends and assumptions as described in the state's analysis.²

	Annual counts of individuals that would be expected to enroll in CHIP, if the proposed demonstration is not implemented.

² The annual counts in Table 5 are calculated by removing the projected annual demonstration population figure from the corresponding annual total combination CHIP enrollment figure(s). These individuals would be expected to enroll in benefits under the Medicaid state plan.



FFY 2021	135,640
FFY 2022	137,977
FFY 2023	137,977
FFY 2024	137,977
FFY 2025	137,977

Table 6. Annual counts of individuals expected to be enrolled in CHIP, assuming that the proposed components of the demonstration are implemented, for each year of the proposed demonstration period, and by each category of beneficiary whose Medicaid or CHIP enrollment is likely to be impacted by the demonstration.

	Total Combination CHIP Enrollment by Year	SCHIP Plan Enrollment by Year	MCHIP Plan Enrollment by Year	Total 1115 Demonstration Enrollment by Year (142%-195% FPL)
FFY 2021	137,874	77,519	58,121	2,234
FFY 2022	140,290	79,121	58,856	2,313
FFY 2023	140,290	79,121	58,856	2,313
FFY 2024	140,290	79,121	58,856	2,313
FFY 2025	140,290	79,121	58,856	2,313

Historical Expenditures and Projected Annual Expenditures

The table below provides historical demonstration expenditures and projected costs over the requested demonstration extension period.

Table 7. Summary Historical and Projected Demonstration Expenditures

Demonstration Population Annual Expenditures and Projected Annual Costs for Requested Extension Period	
Federal Fiscal Year (Demonstration Period)	Expenditure
FFY 2016 (Current Demonstration Period - Year 1)	\$ 18,135,045
FFY 2017 (Current Demonstration Period - Year 2)	\$ 14,820,787
FFY 2018 (Current Demonstration Period - Year 3)	\$ 18,689,341
FFY 2019 (Current Demonstration Period - Year 4)	\$ 23,151,976
FFY 2020 (Current Demonstration Period - Year 5)	\$ 22,279,510
FFY 2021	\$ 23,153,954



(Requested Demonstration Extension Period - Year 1)	
FFY 2022 (Requested Demonstration Extension Period - Year 2)	\$ 24,075,335
FFY 2023 (Requested Demonstration Extension Period - Year 3)	\$ 25,055,201
FFY 2024 (Requested Demonstration Extension Period - Year 4)	\$ 26,074,948
FFY 2024 (Requested Demonstration Extension Period - Year 5)	\$ 27,136,198

Opportunity for Public Comment

The proposed section 1115 demonstration extension application and interim evaluation report are available for public review and comment at:

<https://www.colorado.gov/pacific/sites/default/files/CHPPlusPrenatal1115DemonstrationApplication.pdf>

<https://www.colorado.gov/pacific/sites/default/files/CHPPlusPrenatal1115InterimEvaluation.pdf>

To request a copy of the waiver, please contact the Department by:

- Sending an email request to hcpf_PrenatalDemonstration@state.co.us
- Send a request by fax to 303-866-2573, Attn: 1115 CHP+ Prenatal Waiver Application, or
- Obtaining a paper copy in person is not possible at the Department's office due to the need to follow proper social distancing and safety precautions for the COVID-19 public health emergency.
- You may request to receive a paper copy by post by submitting a request to the email or telephone number below.
 - hcpf_PrenatalDemonstration@state.co.us
 - 303-866-3284

During the public comment period, comments may be sent to

hcpf_PrenatalDemonstration@state.co.us. Public comments may also be submitted by post to:

Colorado Department of Health Care Policy and Financing
1570 Grant Street
Denver, Colorado 80203
ATTN: Public Comment – 1115 CHP+ Prenatal Waiver Application

Additional information will be posted on the Department's Child Health Plan *Plus* Prenatal Waiver webpage, at <https://www.colorado.gov/pacific/hcpf/child-health-plan-plus-prenatal-waiver>.

Public Hearings

The Department invites the public to attend public hearings by teleconference/webinar to learn more about Colorado's waiver application and provide comments.

	Public Hearing #1	Public Hearing #2
Date	Wednesday July 15, 2020	Thursday July 16, 2020



Time	11:00 am — 1:00 pm	11:00 am — 1:00 pm
Venue	Virtual Remote Meeting	Virtual Remote Meeting
Teleconference	Conference Line: 1-877-820-7831 Participant Code: 499-449 #	Conference Line: 1-877-820-7831 Participant Code: 499-449 #
Webinar	https://cohcpf.adobeconnect.com/chppl_usprenatal1115waiver/	https://cohcpf.adobeconnect.com/chppl_usprenatal1115waiver/

Reasonable accommodations will be provided upon request for persons with disabilities. Please notify the Department's 504/ADA Coordinator at hcpf504ada@state.co.us or Jeffrey Jaskunas at jeffrey.jaskunas@state.co.us at least one week before the public notice period to make arrangements.

CMS/Medicaid Demonstration Website

Relevant webpages and additional information regarding the Medicaid demonstration can be viewed on the CMS/Medicaid website, at: <https://www.medicaid.gov/medicaid/section-1115-demo/index.html>

Full Notice of Public Comment Process

The full notice of the public comment process is available on the Department's Child Health Plan Plus Prenatal Waiver webpage, at <https://www.colorado.gov/pacific/hcpf/child-health-plan-plus-prenatal-waiver>.

This notice is submitted pursuant to Title 42 Code of Federal Regulations, Part 431.408, Subpart G, which outlines public notice processes and transparency requirements for Section 1115 Demonstrations.

