

County Role, Responsibilities and Opportunities

October 1, 2024



Overview

- Welcome
- Supporting Counties
- Roles and Responsibilities
- Engagement and Collaboration



Welcome

- **Meeting Purpose:** Specific to Medicaid income eligible (MAGI) populations, a group of stakeholders requested a deep dive into county alignment. They requested today's meeting clarify roles of counties vs. state vs. providers; identify opportunities to garner support for counties including increasing resources for staff and training and implementation of Senate Bill 235 Phase 1 recommendations; and continue discussion on fostering local, county-level dialogue.
- Opening Remarks - Megan Burch, CHSDA President & Kim Bimestefer, HCPF Executive Director
- Introductions



State Supports for Counties

How HCPF can support local eligibility and enrollment



Priority: Supporting County & Eligibility Workers

SB 22-235 report due to JBC in November 2024

- New funding model, county workforce to match need and higher salaries to improve county ability to hire/retain workers
- Intelligent Character Recognition and Interactive Voice Response technology
- Policy guidance improvements
- Service delivery standards and aligning administrative requirements
- Pool hours and supports for training and complex cases

Reducing county workload and improving accuracy

- Improving renewal ex parte automation, PEAK member digital tool capabilities and utilization, and PEAKPro provider/community partner elig. tool
- Improving CBMS Medicaid/CHP+ member letters

Joint Agency Interoperability Co-Created with Counties

- Unified work management system across counties
- Unified document retention system across counties
- ITN is active through mid October

CBMS Strategy and Vision Co-Created with Counties

- Improves CBMS support system for workers and members



Questions Discussion



Roles and Responsibilities



COLORADO

Department of Health Care
Policy & Financing

Types of Sites

Type of Site	Discretion of Eligibility?	Merit-based, governmental employees?	Carries Ongoing Caseload?	# of Sites	Access to CBMS?
County	Yes	Yes	Yes	*59	Full Access
Medical Assistance Site	No	Yes	Limited	4	Limited Full Access
Eligibility Application Partner Site	No	No	No - Can only do initial application	8	Limited Access
Certified Application Assistance Site	No	No	No	222	No
Presumptive Eligibility Site	No	No	No	40	Limited to PE Access



*There are 64 counties, Rio Grande and Mineral, Gunnison and Hinsdale partner as eligibility sites.

State's Role in Medicaid



State Role in Medicaid

- Department of Health Care Policy and Financing (HCPF) is the single state Medicaid agency for Colorado per 42 CFR Part 431.10(b)
- Single state agencies are responsible for all duties relating to supervision and administration of the Medicaid State Plan, including eligibility determination
- In Colorado, the state has elected to delegate eligibility and enrollment activities to the state's 64 county departments of human/social services (counties), as allowed per 42 CFR Part 431.10(c)
- HCPF is then responsible for ensuring counties comply with all relevant laws, regulations and requirements per 42 CFR Part 431.10(c)(3)(i)



State's Responsibilities

- Establishes the policies, rules, and regulations that govern Medical Assistance Programs, including County Administration rules and contracts
- Sets administrative requirements for counties, who have been delegated eligibility and enrollment activities. This includes establishing training standards and expectations to ensure consistency across county staff.
- Administers Medical Assistance Programs to assure compliance with state and federal rules, guidelines and regulations. This includes the sole authority to interpret federal policy
- Establishes statewide policy to ensure equitable administration per 42 CFR Part 431.50(b)(1). This is done by:
 - Rulemaking through Medical Services Board and Executive Director Rules
 - Published guidance through the HCPF Memo Series
- Determines benefit and reimbursement levels for all medical assistance programs according to state and federal legislative intent
- Directs and monitors the activities of the fiscal agent (claims payments to providers)
- Reviews and monitors program utilization



Counties' Role in Medicaid



Colorado's State-Supervised, County-Administered Eligibility System

- In Colorado, the State has delegated eligibility and enrollment activities to each county. As such, the county is responsible for the eligibility determinations of its county residents
- As the supervisor of the counties and their Medical Assistance activities, HCPF has the sole role of enforcing performance and compliance standards and fiscal accountability
- Statute limits HCPF's ability to pass on federal sanctions to counties. Therefore, when federal non-compliance is identified, the State is responsible for those sanctions



County Roles and Responsibilities

Duties on behalf of the state (as agents of the state)

- Ensure ongoing compliance with all relevant federal and state laws, regulations and guidance
- Ensure ongoing operations of the county department, including hiring and staffing; budgeting and fiscal accountability; avoidance of conflicts-of-interest
- Comply with state and federal performance standards and compliance reviews, including quality assurance and customer service monitoring

Duties on behalf of applicants and members

- Determine initial and ongoing eligibility
- Advise members of Medical Assistance and other benefits
- Conduct program integrity activities for eligibility determination
- Coordinate with child welfare and adult protective services on applicants and members enrolled in Medical Assistance



County Financing

- Counties pay a portion of all costs for the administrative activities counties conduct under Roles and Responsibilities, including costs related to their operations for eligibility and enrollment.
- This is called the “local share.” Counties pay anywhere from 10-20% of the total costs for county administration.
- Local share typically comes from local property taxes or mill levies, which are subject to economic conditions, impacting the counties’ ability to fully fund their local share.
- If a county does not have the full local share available, it cannot pull down the federal and state dollars needed to fund its operations.



What counties don't do

Counties have a clearly defined role in the Medical Assistance eligibility and enrollment system. They do not:-

- Interpret federal or state policy for statewide implementation
- Implement or manage any state IT systems, including claims and eligibility
- Support providers or anything related to claims or provider payments
- Determine functional eligibility, unless they are a case management agency acting under contract (only 8 counties are CMAs)
- HCPF does not fund counties to do ongoing outreach



State Supervision

How HCPF conducts County Oversight



How HCPF monitors and advances county performance and compliance

- 42 CFR Part 431 and 2 CFR Part 200 are the primary federal regulations governing HCPF's oversight of counties
- Oversight is conducted through multiple programs tied to regulations and contracts
- Regulatory oversight is found 10 CCR 2505-5 1.010 and 1.020
- Contractual oversight is through the County Incentives Program contracts



County Compliance Monitoring

HCPF conducts county compliance monitoring through oversight programs

Management Evaluation Review Program (10 CCR 2505-5 1.020.10):

- Management evaluations are conducted with every county once every 3 years (due to HCPF resource limitations); the county compliance team reviews compliance with federal and state laws, rules and published guidance
 - Review the counties' internal written policies to ensure compliance
 - Review internal audits to determine themes, trends and opportunities for improvement
 - Review internal controls, staff training plans, civil rights plan, confidentiality policies, and administrative program requirements

Desk Review Program (10 CCR 2505-5 1.020.10):

- Issue specific review based on complaints and escalations to see if there is pattern or systematic problems

Findings from both programs can result in Management Decision Letters, Improvement Action Plans and Corrective Action Plans (10 CCR 2505-5 1.020.11)



ME Review Program Process

Management Evaluation Review Process



County Performance Monitoring

Medical Assistance Performance (MAP) performance management program: HCPF monitors county performance across eligibility determination and customer service.

MAP produces monthly dashboards that are available to all counties that measure performance across new applications and renewals to ensure they are processed timely. Counties also have access to real-time data through the CBMS County Dashboard

HCPF also monitors call center wait times across the Big 11 counties, as well as customer service survey data, through the MAP Dashboard



County Performance Monitoring, Cont'd

Through performance monitoring, more than 2 months of non compliance results in HCPF outreach to the county director.

An additional month of non-compliance results in a Management Decision Letter (MDL), which requires the county to submit a plan on how they will come into compliance. Refusal to comply or respond could lead to actions specified in 10 CCR 2505-5 1.020.11

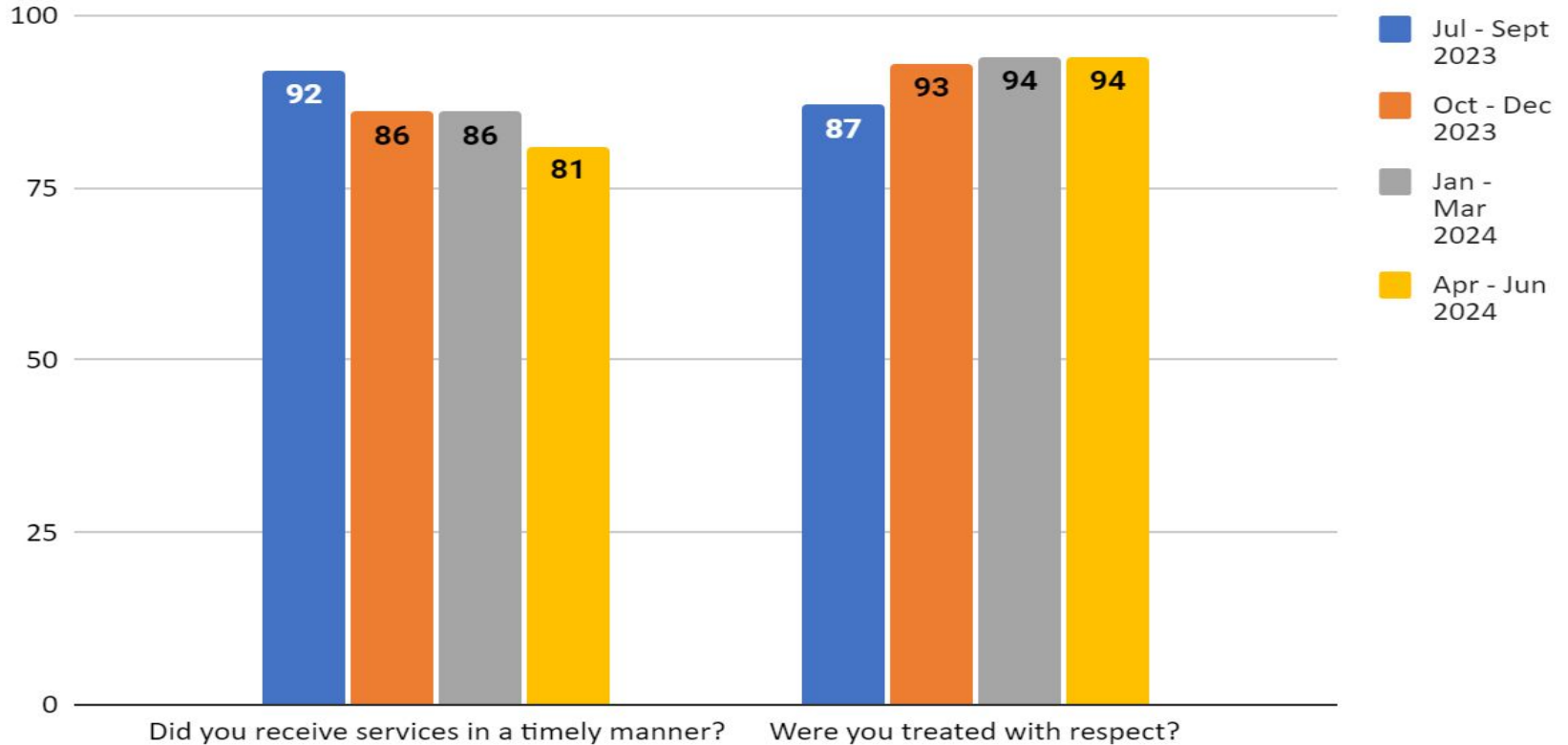
Additionally, HCPF incentivizes county performance through the County Incentives Program. This program puts performance contracts in place so that if counties meet HCPF-specified benchmarks and/or deliverables, they “earn” a portion of their local share back.



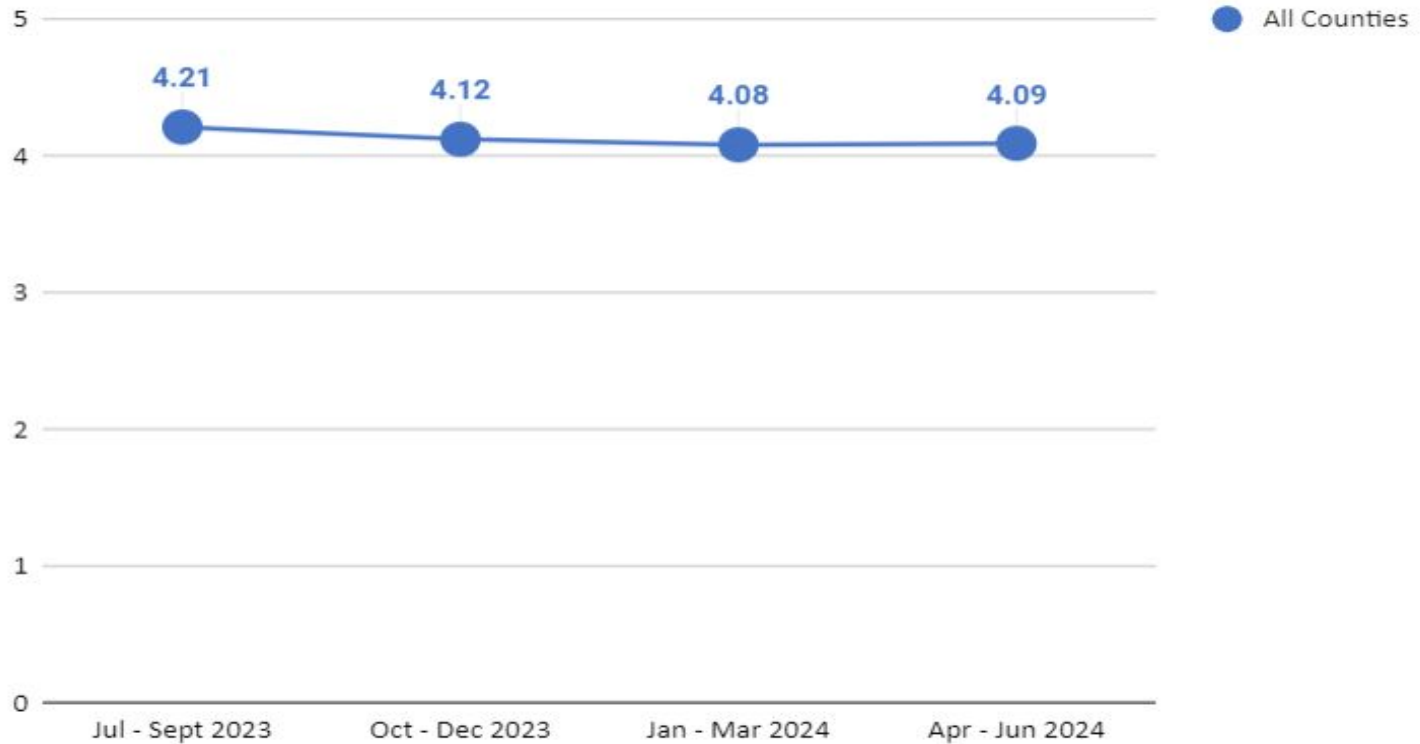
Transparency in Performance

- HCPF endeavors to be transparent with performance data, when possible
- Historically, county performance data for Medical Assistance programs was not shared publicly
- With county support, HCPF will begin to share statewide performance data in specific areas.
- This data will be limited to state performance, and will not include county-specifics

Customer Service Results



Customer Service Results





Questions Discussion



Engagement and Collaboration with Counties and on County Issues



We want to hear your voice

We invite you to join the County Operational Rules Stakeholder Revision Sessions (County Administration)

- Contact hcpf_countyrelations@state.co.us; the Partner Relations and Administration Division will collect your information for an upcoming stakeholder meeting on these rules
- Note: these are not eligibility determination rules and do not govern how eligibility is determined
- HCPF had the strong support of advocacy and provider groups in the 2021 revisions. This update will build on that work



Promoting collaboration with advocates and families at the county level

- Counties endeavor to have good working relationships with partner organizations to best serve our community.
- Counties help community members navigate eligibility for a whole range of programs we are responsible administering (child care, food, financial, etc.), but only meet a portion of the whole person/family needs. Referrals to partner organizations are crucial.



Local Collaboration (cont)

Interested in deeper collaboration with counties locally?

Start by contacting the local Human Services Director.

- Feedback from customers and community partnerships are crucial to serving our local community members fully
- Learn more about program timeframes
- Understand required verifications





Questions Discussion



Thank you

