FAQ for Retro Closing and Exceptions to 10 Day Noticing

October 2016

Retro Closing and 10 Day Noticing Background

Beginning on March 20, 2016, the Department of Health Care Policy and Financing (HCPF) implemented changes to the policy and logic in the Colorado Benefits Management System (CBMS) for retroactive or retro-closing and noticing for ongoing cases and redeterminations. The Department implemented these changes to comply with federal regulation (42 CFR §§ 431.211, 213-214).

As a result of these changes, CBMS eligibility workers will only be able to retro-close cases for death or incarceration. Retro closing for incarceration will only affect QMB, SLMB, QI-1, QDWI, and LIS programs. When a worker enters the date of death or incarceration, CBMS will automatically close the case back to the date of the event. These are the only circumstances under which a case will be retro-closed.

The following four circumstances will no longer retro-close and individuals will be terminated without 10 day noticing. They are:
- Not requesting assistance;
- Not in the home;
- Not a Colorado resident;
- Whereabouts unknown.

Based on clarification from CMS, the individual's Medicaid or CHP+ coverage will end as of the end of the month the action occurs, regardless if there are 10 or more days left in the month. When the worker enters one of these termination reasons in CBMS, the majority of cases will be closed on the last day of the month that the change was reported. The exception is that if the change was reported on the last day of the month, then the case will be terminated on the last day of the next month.

Ten day noticing will continue to apply under all other circumstances.

Is it true that CBMS workers can no longer retro-close cases in any circumstances?

No, workers can still retro–close in the case of death or incarceration. There also is the ability for a limited number of HCPF staff to retro-close when determined necessary through an appeal.

What do I do when a person tells me that they should never have been eligible for Medicaid, and wants their Medicaid case to be retro-closed?

An individual's coverage can be terminated but it cannot be retroactively terminated. The individual's only option to have their case retro actively terminated is to file a timely appeal.

What about when the county needs to recover claims from a fraud investigation, can we retro-close in that situation?

No, you can no longer retro-close cases, except for death or incarceration. Follow your county process for claims and billing.

I need to retro-close a case for a reason other than death or incarceration, can I enter death or incarceration as the termination reason and leave a note in CBMS detailing the actions I took?

No, you cannot. This action would go against federal regulations and policy and would be considered as falsifying information. You can only retro-close for death and incarceration when there is death or incarceration.

What do I do if the case is stuck and I can't run it backward?

Consult your internal training process and submit a Help Desk Ticket (HDT) if appropriate. For this process a case will only run forward.

The loss of the retro-close will severely limit our ability to address certain problems when CBMS is not functioning properly. What are we supposed to do to resolve these problems with CBMS without retro-closing?

When the system is not functioning properly you need to submit a Help Desk Ticket (HDT). Follow your existing process for when and how to submit a HDT.

What about the case where a family is living out-of-state and they can't get coverage from the other state because we have an open Med Span?

If the family is living out-of-state, you will be able to close the case without 10 day noticing, but you will not be able to retro-close the case.

Will this affect community spouse who are applying for Long Term Care (LTC)?

We don't anticipate that it will have any effect on community spouses. If problem occurs, please submit a Help Desk Ticket.

What if the client was not requesting assistance in previous months?

We can only terminate a case for "not requesting assistance" going forward, but 10 day noticing is not required. When the worker enters this termination reason, CBMS will terminate the case appropriately.

How does this effect a general assistance burial when the burial is processed the following month after the date of death?

This CBMS change is not designed to impact general assistance burials. If a problem occurs, follow your existing process to submit a Help Desk Ticket.

What if a client asks us to retro-close the case in order to ensure they keep their Advanced Premium Tax Credits (APTC) to purchase private health insurance through Connect for Health Colorado?

If they believe that they have wrongly been determined eligible for Medicaid or CHP+ they can appeal the eligibility determination. If appropriate and they have filed a timely appeal, the case can be retro-closed. Outside of an appeal, death, or incarceration the case cannot be retro-closed. A person cannot receive APTC while they have Minimum Essential Coverage (MEC) such as Medicaid or CHP+. A person could be eligible for APTC on the first day after the loss of MEC. For more questions regarding the impact on their APTC they should contact Connect for Health Colorado.

For more information contact

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