



OPERATIONAL MEMO

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DIVISION AND OFFICE:	COMMUNICATIONS AND GOVERNMENT RELATIONS, POLICY, COMMUNICATIONS AND ADMINISTRATION OFFICE
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Purpose and Audience:

This Operational Memo communicates to county departments of human/social services and other eligibility sites the program requirements and processes for the Department of Health Care Policy and Financing (referenced herein as “the Department” or “HCPF”), in its statutory oversight role in the administration of the Medical Assistance Program, to implement site audits through the HCPF Management Evaluation (ME) Review Program. These site reviews will occur over a multi-year cycle and aim to address county or site compliance issues discovered by the ME Review Program and routine monitoring, quality assurance, administrative desk reviews and other types of Department supervision activities.

The purpose of this Operational Memo is to document the program requirements and processes used for the HCPF ME Review Program site reviews. Non-compliance with ME Review Program requirements and processes, as determined by the Department in its statutory oversight role, can result in notification of non-compliance as found in [HCPF Operational Memo 21-004](#), “Improvement Action and Corrective Action Plans.”

Information:Medicaid Background

Medicaid is the nation's public health insurance program for people with low income. In Colorado Medicaid is known as Health First Colorado and covers nearly 1 in 4 Coloradans, including many with complex health care needs. The program is the principal source of long-term care coverage for Americans. Most Medicaid enrollees lack access to other affordable health insurance. Medicaid covers a broad array of health services and limits enrollee out-of-pocket costs. Medicaid finances nearly a fifth of all personal health care spending in the United States, providing significant financing for hospitals, community health centers, physicians, nursing homes, and jobs in the health care sector.

Background of HCPF ME Review Program

Colorado's state-supervised, county-administered human services delivery system means that County Departments of human/social services and Eligibility Sites play critical roles in serving Health First Colorado applicants and members. Therefore, evaluation of County- and Eligibility Site-administered programs is critical to both the applicant and member experience and the success and sustainability of Health First Colorado. As the state department with statutory responsibility for the supervision of local administration of the Medical Assistance Program (which includes Medicaid and Child Health Plan *Plus*), it is critical that HCPF continuously assesses site administration of the program to ensure a proper applicant and member experience, demonstrate compliance with federal and state requirements, monitor progress towards program goals and to identify potential best practices and lessons learned for all Eligibility Sites. Over time, ME Review results will be integrated back into the program to improve performance and improve applicant and member experience.

The ME Review Program is the Department's on-site review program and replaces components of the Medical Eligibility Quality Improvement Plan (MEQIP). The program will apply to both County Departments of human/social services and Eligibility Sites.

Overview

The ME Review Program provides the Department with a consistent framework of oversight across different Medicaid program areas. These program areas are varied and include fields such as administration, eligibility determination, quality assurance, customer service and program integrity, to name a few.

The ME Review Program consists of several different “modules” that encompass a program area and includes a compliance survey and staff interviews. The compliance survey helps determine how many program requirements or aspects the county or site may be out of compliance with. The staff engagement component aims to collect information from the site through interviews with county or site staff to help identify root causes of compliance issues, provide targeted technical assistance and address member experience. Some modules may review specific types of information, such as performance dashboards or reports, which may require specific actions to be taken, such as addressing a performance issue or implementing an Improvement Action Plan (IAP) or Corrective Action Plan (CAP). The information collected from the compliance survey, the process questionnaire and the various modules is then compiled into ME Review Reports, which outline and summarize the results of the ME Review and the necessary actions and steps to be taken. ME Review Reports are signed by both the county or site and the Department, signaling agreement and a commitment by HCPF to provide technical assistance to help address issues discovered, if any.

The ME Review Reports creates a standardized approach of non-compliance measurement, helping the Department better target resources, support and assistance where needed.

ME Review Program Guide

This ME Review Program Guide is designed to support Eligibility Sites in familiarizing themselves with the HCPF ME Review Program. The Program Guide provides an overview of the process and program requirements and describes the different modules and process questionnaires and compliance surveys. The Program Guide and this Operational Memo are considered the authoritative sources for the HCPF ME Review Program and should be referenced as necessary.

As federal or state regulations, rules and requirements change, audit findings issued, or applicant or member experience issues discovered, process questionnaires and compliance surveys may be removed, added, or changed. To reflect this, the ME Review Program Guide will include a change log that details any removals, additions or changes. Counties and eligibility sites will only be subject to review using the most recent edition, based on date, of the ME Review Program Guide.

If a process questionnaire or compliance survey is added or modified within 60 calendar days prior to an ME Review being conducted, non-compliance with the added or modified review will trigger an IAP instead of CAP. This allows time for the county or site to gain compliance before formal CAP process is initiated; this is referenced as the “hold harmless” policy for HCPF ME Reviews.

Compliance with the HCPF ME Review Program

As part of the Department's site audits, non-compliance with the HCPF ME Review Program or findings of the program may result in notification of non-compliance and implementation of IAPs or CAPs and related processes as described in [HCPF Operational Memo 21-004](#), "Improvement Action and Corrective Action Plans.". Areas of non-compliance include, but are not limited to:

- Failure to comply with any step of the ME Review Program process as described in the ME Review Program Guide
- Failure to attend and/or request reschedule of any intake session, conference or module session after notification of scheduled ME Review or based on mutually agreed-upon dates and times
- Results from any compliance survey where the county or site is not in compliance with federal or state guidance, communications, training or best practices.
- Results from any process questionnaire where the county or site is not in compliance with federal or state regulations, rules or requirements
- Failure to implement or comply with IAPs or CAPs implemented as a result of the HCPF ME Review Program or other audits, supervision and oversight
- General non-compliance with HCPF ME Review Program requirements as documented and communicated to the county or site

Finding Resources, Submitting Documents and Requesting Support

Where requested in this Operational Memo or by the HCPF ME Review Program, the county or site shall send electronic communications, submit requested documentation, request assistance, support or to be contacted or to submit general questions, the county or site by reaching out to the Department contact listed below.

General information on HCPF ME Review Program, IAPs, CAPs and general information on oversight can be found on our webpage at www.colorado.gov/county-admin.

Attachment(s):

ME Review Guide

Department Contact:

Steve King, County Oversight Administrator
HCPF_MEReview@state.co.us