



OPERATIONAL MEMO

TITLE:	INNOVAGE PACE COLORADO ENROLLMENT SANCTION
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	DECEMBER 23, 2021
DIVISION AND OFFICE:	CASE MANAGEMENT & QUALITY PERFORMANCE DIVISION, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	CASE MANAGEMENT, BENEFITS & SERVICES, PROGRAM OF ALL-INCLUSIVE CARE FOR THE ELDERLY (PACE)
KEY WORDS:	CASE MANAGEMENT, PACE, INNOVAGE, ENROLLMENT, AUDIT, ENROLLMENT SANCTION
OPERATIONAL MEMO NUMBER: HCPF OM 21-092	
ISSUE DATE: DECEMBER 23, 2021	
APPROVED BY: COLIN LAUGHLIN	

HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to inform Case Management Agencies (CMAs) of changes regarding assessment and option counseling process for the functional eligibility determination of potential members seeking enrollment into the Program of All-Inclusive Care for the Elderly (PACE) with InnovAge. The Operational Memo serves to inform CMAs regarding the audit and enrollment sanctions placed on InnovAge PACE Colorado operations.

Information:

On May 26, 2021, the State through the Department of Health Care Policy & Financing (Department) and the Colorado Department of Public Health and Environment (CDPHE) conducted an audit of InnovAge Colorado operations for all centers. As a result, the State identified numerous concerns related to the delivery of services, timeliness of service provision, and appropriate level of staffing to meet participant needs.



As an outcome of these audit results, the Department has concluded that InnovAge Colorado failed substantially to provide its participants with medically necessary items and services covered under PACE, which adversely affected or had the substantial likelihood of adversely affecting its participants. This determination was made as a result of deficiencies discovered during an audit. Consequently, the Department has determined that the seriousness of these deficiencies requires the suspension of any new enrollments of Medicaid beneficiaries for all InnovAge Colorado centers.

To ensure compliance with these sanctions, the Department requests that, effective immediately, CMAs do not initiate any new referrals or applications for InnovAge PACE. CMAs may continue to process referrals and assessments for long term care services but must inform the member that they cannot enroll with InnovAge PACE due to the placed enrollment sanctions. Department requests that CMAs provide appropriate option counseling of alternative long term care services for the members.

If an application has already been submitted prior to Thursday, December 23, 2021, CMAs may continue to process the enrollment for those participants. Please note, any applications currently in process must be completed by December 31, 2021, for a January 1, 2021, enrollment. If they are not completed Case Managers will need to assist members in selection of a different provider.

Also, HCPF requests that CMAs ensure that timely documentation is completed of all CMA activities in the Department's prescribed system, Benefits Utilization System (BUS).

Note that the enrollment sanctions only apply to InnovAge PACE. CMAs must continue to provide assessments and options counseling for all other PACE Organizations.

Attachment(s):

Please find the notice of action and summary of findings here:

<https://hcpf.colorado.gov/program-all-inclusive-care-elderly>

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