



OPERATIONAL MEMO

TITLE:	PHE UNWIND AND MEMBER COMMUNICATIONS
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	MAY 19, 2022
DIVISION AND OFFICE:	HEALTH PROGRAMS OFFICE, POLICY, COMMUNICATIONS & ADMINISTRATION OFFICE
PROGRAM AREA:	ACCOUNTABLE CARE COLLABORATIVE
KEY WORDS:	COVID-19, TEXT CAMPAIGN, EMAIL CAMPAIGN, MEMBER CONTACT INFORMATION, PHE, PUBLIC HEALTH EMERGENCY
OPERATIONAL MEMO NUMBER: HCPF OM 22-027	
ISSUE DATE: MAY 19, 2022	
APPROVED BY: TRACY JOHNSON	

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

Purpose and Audience:

As a condition of enhanced funding under the Families First Coronavirus Response Act, the Colorado Department of Health Care Policy and Financing (HCPF) maintained continuous coverage during the COVID-19 pandemic. When the public health emergency (PHE) ends, HCPF will resume standard renewal processes. HCPF is partnering with our Regional Accountable Entities (RAEs) and Managed Care Organizations (MCOs) to assist in outreach to members during the renewal process, including but not limited to sending text and email communications to members regarding the renewal process. The RAEs should work closely with HCPF on their communication plans and leverage Department-created messaging to help ensure consistency in outreach. Some members will be automatically renewed using information we have from other databases, known as Ex Parte renewals. All other members will need to submit additional documentation and/or signatures to keep coverage and may ultimately no longer qualify for coverage depending on their household circumstances.

As a result of the COVID-19 pandemic, many members have moved or changed their contact information. Text messaging and email can be cost-effective and a flexible means to reach members who have indicated this is their preferred way to be reached,

have been displaced by housing instability or who are otherwise difficult to contact. Text messaging and emails will not be appropriate for all members and tailored outreach strategies are recommended to meet those members' needs.

Recent federal guidance allows the Department to partner with RAEs and MCOs during the renewal process. This memo provides additional operational information for RAE and MCO partners as we prepare together for the eventual end of the public health emergency and potential transitions in coverage for members.

Information:

Text communications about the renewal process by the RAEs and MCOs are permitted under the Telephone Consumer Protection Act (TCPA) because our members have provided their cellphone numbers to the Department in relation to their eligibility for, and provision of, Medicaid. Therefore, members have provided their prior express consent to receive automated messages about their eligibility for Medicaid. These communications are also permitted under the health care exception under the TCPA which does not require prior express written consent when a text message delivers a health care message made on behalf of the Department as a HIPAA covered entity. HCPF intends to draft a contract amendment to cover this scope of work.

The Department is instructing RAEs and MCOs to develop outreach plans, which should include text campaigns of their own and at the direction of the Department for the following topic areas:

- Action(s) members need to take as it relates to the renewal process and the end of the public health emergency.
- Reminder messaging to members to watch for communication from Health First Colorado about their annual renewal.
- Follow up and reminder messaging to members who have not completed the renewal process.

The Department is developing guidance for RAEs and MCOs and will include sample text messages and sample emails in the communications toolkit provided. The toolkit will be released when the PHE end date is known. In the interim, RAEs and MCOs can help members prepare by asking members to ensure their contact information is up-to-date. Members can update their contact information via PEAK, the Health First App or through their local county office.

RAEs and MCOs will be responsible for outlining their member outreach strategy including an emphasis on hard to reach and other focus populations in their PHE Unwind Plans due to the Department on May 31, 2022. These plans must be closely

coordinated with Department outreach to ensure members receive timely and consistent information so they can take action to keep or transition to other coverage for which they qualify.

Attachment(s):

PHE Unwind Plan Template

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