



## OPERATIONAL MEMO

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<b>TITLE:</b>	<b>MEDICAL ASSISTANCE CBMS CASE COMMENTS REQUIREMENTS</b>
<b>SUPERSEDES NUMBER:</b>	<b>N/A</b>
<b>EFFECTIVE DATE:</b>	<b>JUNE 29, 2022</b>
<b>DIVISION AND OFFICE:</b>	<b>MEDICAID OPERATIONS OFFICE</b>
<b>PROGRAM AREA:</b>	<b>MEDICAL ASSISTANCE</b>
<b>KEY WORDS:</b>	<b>CASE COMMENTS, CBMS, ELIGIBILITY SITE RESPONSIBILITIES, AUDITS</b>
<b>OPERATIONAL MEMO NUMBER: HCPF OM 22-035</b>	
<b>ISSUE DATE: JUNE 29, 2022</b>	
<b>APPROVED BY: LISA PERA</b>	

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

### **Purpose and Audience:**

The purpose for this Operational Memo is for the Department of Health Care Policy and Financing (the Department) to promulgate state requirements and operational expectations for and to notify Eligibility Site staff of the minimum requirements for case comments entered into the Colorado Benefits Management System (CBMS) based on federal regulations 42 CFR 435.914 and 42 CFR 431.17. Case comments must be entered into CBMS when determining eligibility, conducting ongoing case maintenance responsibilities, interacting with applicants and members and other situations that require a documented audit trail. As outlined at 42 CFR § 435.914, Case Comments must document facts supporting the eligibility decision. These requirements are compatible and supportive of other high level program groups (HLPGs) case comment requirements.

### **Information:**

The Department has reviewed federal and state regulations, audit findings, and eligibility workers' questions around case comments and identified the minimum requirements to ensure all required Medical Assistance Program information is captured and documented.

It is the Department's expectation that all Eligibility Site staff enter case comments in CBMS at the time of action but no later than one (1) calendar day of any action, interaction, or communication regarding the case or any individual on the case. This includes, but is not limited to contact with members, collateral contacts, or any other authorized stakeholder of the case.

All Eligibility Site staff case comments must meet the minimum requirements listed in the attachment "MA Case Comments Requirements". Please note this attachment will be reviewed and updated periodically by the Department as requirements change. The Department will communicate with Eligibility Sites when updates are made to the attachment. Requirement changes will be communicated to Eligibility Sites through the monthly Memo Series Constant Contact and the County Connections newsletter.

It is a recommended practice to create or update your Site's case comment templates, if used, to reflect the requirements outlined in this memo's attachment.

Case comment requirements outlined in the attachment are subject to Department-level Quality Assurance (QA) reviews and Management Evaluation (ME) Reviews, or other Department-level review after any applicable hold harmless period. In addition, all actions are subject to review by the Department's external auditors; insufficient case comments that do not support the eligibility determination or action can result in external audit findings and may result in the Site receiving a Management Decision Letter (MDL), when selected.

**Attachment(s):**

MA Case Comments Requirements

**Department Contact:**

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