



OPERATIONAL MEMO

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Purpose and Audience:

The purpose of this Operational Memo is to provide information and guidance about the Department of Health Care Policy and Financing's (HCPF or Department) Overflow Processing Center (OPC). The audience of this memo is all county departments of human/social services, Medical Assistance (MA) Sites and Eligibility Application Partners (EAP), collectively referenced throughout this memo as Eligibility Sites.

This memo details processes for requesting assistance from the OPC and requirements for when a site will be required to partner with OPC as part of an Eligibility Site's Improvement Action or Corrective Action Plan (IAP/CAP). An IAP or CAP is required if the Eligibility Site has been issued a Management Decision Letter (MDL) because of the site's performance on the Medical Assistance Performance (MAP) Dashboards or through a regulatory compliance review as detailed in 10 CCR 2505-5 1.020.10 and 1.020.11.

Information:What is the Overflow Processing Center?

In a continued effort to provide Coloradans effective and timely coverage, HCPF secured ongoing funding for an Overflow Processing Center. The OPC was funded through S-10/BA-10 2021 with a budget amendment in FY 21-22 of \$1.8 million, and \$1.9 million in FY 22-22 ongoing. HCPF has contracted with Prowers County to operate the OPC, though the OPC is distinct and separate from the county's department of human/social services. The OPC has a staff of state-trained eligibility technicians dedicated to assisting Eligibility Sites and the Department in meeting federal and state regulatory guidelines for timely processing of Medical Assistance cases.

The OPC is funded annually through the Department's regular budget and is designed to help Eligibility Sites process applications, renewals and case changes for Medical Assistance programs, when the Eligibility Site is unable to do so. It will also be utilized by the State of Colorado to work on special projects as they arise that will help our members statewide.

How the OPC benefits Eligibility Sites

The Overflow Processing Center benefits Eligibility Sites, and therefore benefits applicants and members, by providing support processing cases when needed, including:

- Partnering with the Eligibility Site when a disaster strikes, or a scenario exists where the Site cannot process applications, renewals and case changes due to extenuating scenarios.
- Assisting the Site when staffing or vacancies are impacting performance measures and the ability of the site to process cases timely.
- Helping the Eligibility Site to reduce eligibility determination wait times for applicants and members which helps to ensure quicker access to care for Coloradans.
- Processing applications, renewals and changes from Eligibility Sites to maintain statewide timeliness targets according to state and federal eligibility guidelines.

Types of OPC Assistance

The OPC is currently accepting work including the processing of:

- MAGI and Non-MAGI Cases
- Applications
- Redeterminations
- Case Changes

- Combination cases with other high-level program groups, where the OPC would process the MA portion of the case only

Note: Per existing process, cases that are processed past the due date will count towards the Eligibility Site's performance; this is true whether it's OPC or Eligibility Site staff processing the late case. When the Eligibility Quality Assurance Program conducts an eligibility determination review and the OPC performed the data entry that caused an error, the error will be attributed to the OPC and the OPC worker. OBJ

Eligibility Site assistance from the OPC

In situations where an Eligibility Site is facing circumstances beyond its control that will impact its ability to keep up with and manage their MA workload, the Eligibility Site will have the ability to request support from the OPC. To request assistance from the OPC, all Sites are required to submit the [OPC Request Form](#) located on the HCPF website. Once submitted the Department will review the request and prioritize it according to the amount of work and type of work the OPC is already assisting with. Sites that are mandated to work with OPC or other scenarios the Department deems as an emergency may be prioritized higher than a standard request.

The Department will schedule an initial meeting with the Site within 3 business days of the request to gather more information. During the meeting an agreement will be made by both the Site and OPC on the amount of work, frequency of work, types of cases and the process for accepting cases. A regular check-in meeting will also be scheduled and other instructions on next steps will be provided.

For cases being sent to the Overflow Processing Center (OPC), the following actions must be taken:

For Applications:

- All components of the Application Initiation (AI) process are completed in CBMS, including assigning a case number.

For Renewals:

- Review the case to ensure that it hasn't auto re-enrolled prior to sending to the OPC.
- That haven't auto re-enrolled please start the RRR prior to sending to the OPC.
- That have auto re-enrolled and have changes, these will be tracked as changes not renewals in reported data.

For Changes:

- Please ensure all change documents (verifications) are available to the OPC staff via EDMS or other document management system Note* When sending cases to the OPC please review the case and include all application, renewal or change documents associated with the case.

If a Site has committed to working with OPC and the Site decides they no longer need assistance from the OPC, the Site must notify the Department during its regular scheduled meeting and allow time for the OPC to finish any remaining work.

More information on how to submit a work request, who to contact for assistance and what to expect can be found in the Overflow Processing Center FAQ attached to this memo.

Note: Only Eligibility Sites can request assistance from the OPC.

Department direction to the Eligibility Site to work with the OPC

In specific non-compliance situations or extenuating circumstances, the Department may direct the Eligibility Site to work with the OPC for Medical Assistance cases. Per 10 CCR 2505-5 1.020.11.1.c and the Eligibility Site's contract, the Department will issue notices of non-compliance, known as a Management Decision Letter (MDL), for non-compliance with performance measures on the Medical Assistance Performance (MAP) Dashboards. If the Eligibility Site is issued an MDL, the Eligibility Site will be required to complete either an Improvement Action Plan (IAP) or Corrective Action Plan (CAP) at the Department's direction; this Plan documents the steps the Site will take to gain compliance with MAP Dashboard performance measures. The Plan can be completed independently by the Eligibility Site, or by requesting Department technical assistance.

Upon completion by the Eligibility Site, the Department will review the submitted IAP/CAP and will issue either an acceptance or rejection to the Eligibility Site. If the IAP/CAP is rejected by the Department, Department-provided technical assistance is required for the Eligibility Site to resubmit a corrected Plan. During technical assistance, the Department will recommend the OPC to the Eligibility Site as a support option available. The Department will then issue a final acceptance or rejection.

Once the Eligibility Site receives an acceptance of their IAP/CAP, the Department will continuously monitor the Site's performance. If performance does not improve and the Department determines the Eligibility Site is not complying with the accepted IAP/CAP, the Department can require the Eligibility Site to work with the OPC to prioritize eligibility determinations that are exceeding processing guidelines. The Eligibility Site

can be required by the Department to provide the OPC with the necessary data and information to process those eligibility determinations the Eligibility Site is not in compliance with. The requirement to work with the OPC would remain until the Department issues a notice of plan closure to the Eligibility Site.

Additional information on non-compliance processes can be found at 10 CCR 2505-5 1.020.10 and 1.020.11 and [HCPF Operational Memo 21-078](#).

Eligibility Site Costs associated with the OPC

If the Eligibility Site requests assistance from the OPC, there are no direct costs associated with the request for assistance. However, there may be costs for the Eligibility Site if the Site is deemed by the Department to be regulatorily non-compliant and the Site has been directed to work with the OPC on specific cases that are untimely and/or otherwise require action. Additional information regarding potential associated costs for OPC support resulting from regulatory non-compliance will be shared at the time the Site is formally noticed. In addition, county departments of human/social services are restricted from using county administration funding for eligibility determination costs outside of the county department, unless specific Department approval is issued. For specific funding questions, contact:

- County departments of human/social services can submit funding questions to the County Relations webform or HCPF_CountyRelations@state.co.us
- Medical Assistance and Eligibility Application Partner Sites can submit questions to their contract manager.

Attachment(s):

Overflow Processing Center FAQ

Department Contact:

For OPC related questions, please contact Jesse.Trujillo@state.co.us