



OPERATIONAL MEMO

TITLE:	CONTINUOUS COVERAGE UNWIND MEMBER COMMUNICATIONS: REGIONAL ACCOUNTABLE ENTITY & HEALTH PLAN MEMBER COMMUNICATION COORDINATION OVERVIEW
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This operational memo provides an overview of the Department’s direct-to-Health First Colorado or Child Health Plan *Plus* (CHP+) member communication plan in collaboration with the Regional Accountable Entities (RAEs) and Managed Care Organizations (MCOs) after the COVID-19 Public Health Emergency (PHE) Continuous Coverage Requirement ends.

Purpose and Audience:

As a condition of enhanced funding under the Families First Coronavirus Response Act (FFCRA), the Colorado Department of Health Care Policy & Financing (HCPF) maintained continuous health care coverage for anyone enrolled in Health First Colorado (Colorado’s Medicaid program) or Child Health Plan *Plus* (CHP+) during the COVID-19 pandemic. When the public health emergency (PHE) continuous coverage

requirement ends, HCPF will resume standard renewal processes according to federal guidance timelines. This is referenced below as the COVID-19 PHE Unwind of the continuous coverage requirement. HCPF is partnering with our Regional Accountable Entities (RAEs) and Managed Care Organizations (MCOs) to assist in outreach to members during 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 based on most recent information already on file (reported information from members and/or information from other data sources), known as Ex Parte renewals. All other members will receive a renewal packet several weeks in advance of their renewal month. The packet will ask them if anything about their situation has changed, a signature to acknowledge review of the information, and may request verification to determine whether they still qualify to receive Medical Assistance. The Department's goal is to ensure those who qualify take the needed actions to remain connected to coverage and those who no longer qualify are directed to health coverage options through the Connect for Health Colorado marketplace.

As a result of the COVID-19 pandemic, many members have moved or changed their contact information. Along with traditional outreach, 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](#) encourages the Department to partner with health plans (RAEs and MCOs in Colorado) during the renewal process.

This operational memo provides additional operational information for RAE and MCO partners as we prepare together for the end of the continuous coverage requirement and potential transitions in coverage for members.

Information:

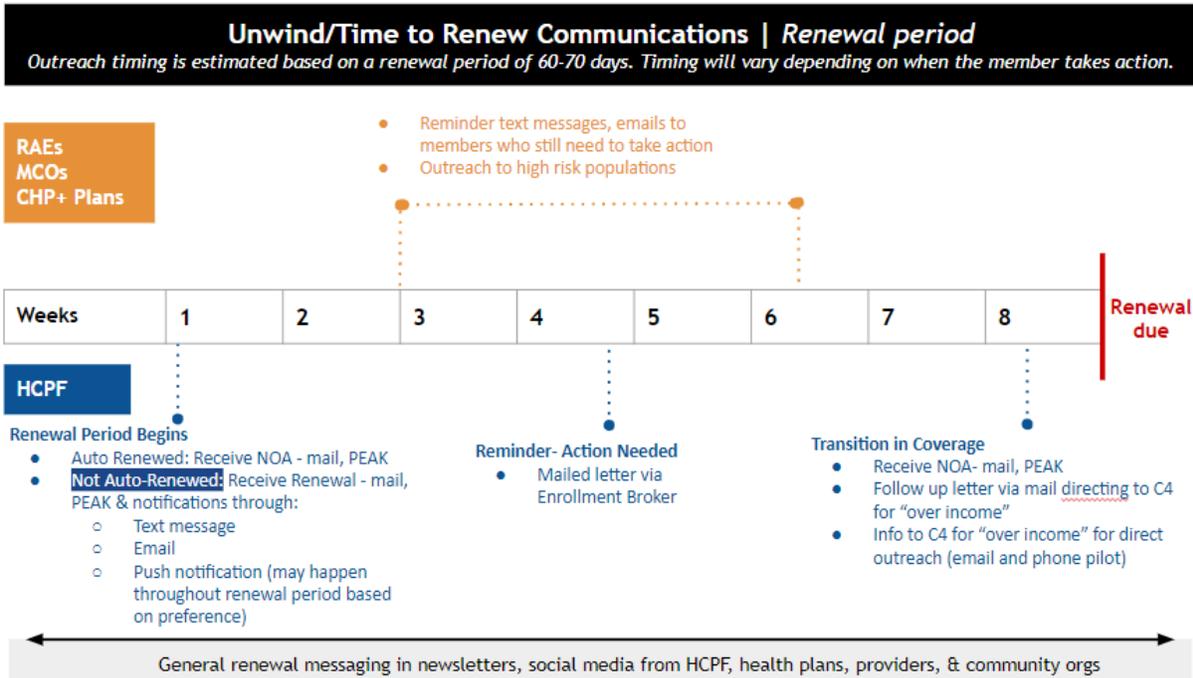
Members told us that they expect to receive messaging from the State and their health plans regarding actions that need to be taken to keep their coverage. As outlined in [HCPF OM 22-027](#) the Department instructed RAEs and MCOs to develop outreach plans with an emphasis on hard-to-reach populations. These plans should include a number of outreach techniques.

Prior to the end of the continuous coverage requirement and the regular renewal process beginning again, the Department will issue a news release informing members

that they will receive messages when their renewals are due from Health First Colorado and their health plans regarding the renewal process and how to take action to maintain their coverage. The Department will also release a communications toolkit titled, "Take Action on Your Renewal," that provides specific language and guidance to RAEs and MCOs about messaging directly to members.

Messaging Coordination Timeline:

Coordinated communication between the RAEs, MCOs and the Department will begin upon the first renewal cycle after the COVID-19 PHE continuous coverage requirement ends, as outlined in the timeline below. Over the course of the entire COVID-19 PHE Unwind of the continuous coverage requirement period, 12 months (14 months with noticing), member notices will be sent by the Department 60-70 days in advance of that member's renewal date. This is how the regular renewal process works; what is different is that we are asking for health plan partners to help remind members they need to take action midway through the renewal cycle. Once the initial official notices are sent by the Department, the Department and RAEs will coordinate direct-to-member outreach to members who still need to take action (this outreach excludes members who have automatically been renewed) on their renewal during the 60-day renewal period. This cadence is depicted below to ensure message coordination only to those that still need to take action and will repeat monthly during the following 12 - 14 months for each member who goes through the renewal process upon their annual renewal date. The renewals will begin with those due in May 2023 (noticing begins in March 2023).



General renewal messaging is provided in the "Take Action on Your Renewal" toolkit and can be used throughout the COVID-19 PHE unwind of the continuous coverage requirement in newsletters, social media, and print materials to support the targeted direct-to-member messaging at the time of their renewal throughout the unwind period.

Department Expectations for Member Communications:

Member Communication Cadence: The Department will send out the first round of communications including all official notices. RAEs and MCOs will receive coordinated data pulls from the Department during the COVID-19 PHE Unwind of the continuous coverage requirement. A separate Operational Memo will provide guidance to RAEs on how to use the data pull to know when a member’s renewal is due, which data set to look at to understand if the member has taken action on their renewal and what that member’s communication preferences are to tailor outreach accordingly. RAEs and MCOs are expected to send reminder noticing to these members who have not taken action on their renewal and conduct additional outreach to high-risk populations who may be disenrolled because they have not taken action on their renewals. Language for outreach will be provided in the Department communications toolkit. The Department expects a member to be outreached during their renewal window in accordance with the member’s communication preferences. If a RAE or MCO would like to alter the

cadence of communication, they should review this plan with the Department by contacting Alison Ledden, alison.ledden@state.co.us.

Review of RAE/MCO-produced communications: If a RAE or MCO chooses to create their own communication tools (flyers, emails, videos, newsletters) with messaging that has not been provided by the Department in the form of a communications toolkit, the Department will require two weeks to review these materials to ensure message and brand consistency. Materials can be sent to: alison.ledden@state.co.us.

Ex Parte (automatic renewals through existing data) Communications: RAEs and MCOs should exclude these members from outreach communications regarding their renewal and target outreach to those members who still need to take action to remain covered. The data memo includes more detail on this.

Department Expectations for RAEs/CHP+ Plans that have a Plan Option on the Exchange: We are developing a Transitions in Coverage Guidance for RAEs/MCOs Operational Memo with suggested scripting to guide discussions and handoffs to Connect for Health Colorado Assistants for those who are no longer eligible for Health First Colorado or the Child Health Plan *Plus* (CHP+) coverage. We understand continuity of providers may be important to our members and encourage you to work closely with those members on warm handoffs to Connect for Health Colorado Assistants who can help them find the right plan for their needs.

Attachment(s):

[HCPF OM 22-027](#) & PHE Unwind Plan Template

[HCPF OM 23-007](#) - Continuous Coverage Unwind Member Communications: Leveraging Data to Conduct Outreach

[HCPF OM 23-008](#) - Continuous Coverage Unwind Member Communications: Transitions in Coverage Guidance for RAEs/MCOs

[HCPF OM 23-006](#) - Continuous Coverage Unwind Member Communications: Text Messaging

[Update Your Address Campaign Toolkit](#)

[Get Ready for Renewals Toolkit](#)

Take Action on Your Renewal Toolkit

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