



## OPERATIONAL MEMO

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| <b>TITLE:</b>                                  | <b>CONTINUOUS COVERAGE UNWIND: REVISED REGIONAL ACCOUNTABLE ENTITY &amp; MANAGED CARE ORGANIZATION DATA PULL AND MEMBER COMMUNICATION COORDINATION</b> |
| <b>SUPERSEDES NUMBER:</b>                      | <b>HCPF OM 23-007</b>  |
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| <b>DIVISION AND OFFICE:</b>                    | <b>HEALTH PROGRAMS OFFICE<br/><br/>COST CONTROL AND QUALITY IMPROVEMENT OFFICE<br/><br/>POLICY, COMMUNICATIONS &amp; ADMINISTRATION OFFICE</b>         |
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*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

**This February 24, 2023 revision to AM 23-007 clarifies “high risk” member definitions, clarifies warm handoffs to Connect for Health Colorado expectations as optional and clarifies the “sample” timeline to show outreach flexibilities for RAEs/MCOs given operationalization of their outreach plans.**

### **Purpose and Audience:**

This operational memo provides an overview of how the Regional Accountable Entities (RAEs) and Managed Care Organizations (MCOs) are to use the Department’s data pulls to outreach to members. Topics covered in this memo include: when a member’s renewal is due, which data fields to look at to understand if the member has taken

action on their renewal, and how the data should be utilized to time member communication.

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) 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 RAEs and 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 will 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. Those automatically renewed through the Ex Parte process will be excluded from outreach communications. 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 other health coverage options and 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.**

### **Overview:**

The Department is providing the RAEs and MCOs weekly member data files (UNWWD\_EXPORT\_RAE/MCO\_YYYYMMDD) through Moveit. The RAEs/MCOs are expected to use these files to plan and coordinate member outreach regarding the Medicaid renewal process. These data files are specific to each RAE or MCO and include member demographic and contact details, chronic condition information for applicable members, member eligibility information, and stop reason values that explain why a member is no longer eligible.

## **Department Expectations for RAE Member Communications and Timeline:**

When a member's renewal is due, the Department will send out the first round of communications including all official notices. More detail is available in the Continuous Coverage Unwind Member Communications Overview Memo, links to which are at the end of this document. RAEs and MCOs are expected to send reminder notices to members who have not taken action on their renewal and to conduct outreach to high-risk populations which could include phone calls using the language 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.

## **Key Components of Weekly Data File and Outreach Guidance:**

### *Renewal Dates*

The RAEs and MCOs should use the weekly data file received from HCPF to plan their member outreach. The **REDTRM\_DT** data field is the member's renewal date. All renewal outreach activities should start 8 weeks prior to that date.

- The Department conducts the initial communications to members.
- The initial RAE/MCO outreach will occur at or around Week 3 (5 weeks prior to the **REDTRM\_DT**).
- If the member has not yet taken action, the second RAE/MCO outreach will occur at or around Week 5 (3 weeks prior to the **REDTRM\_DT**).
- Additional outreach to high risk populations may occur after week 5 per the RAEs communication plans.

### *Coverage End Dates*

The 12/31/2299 is a default eligibility end date, **CLNT\_ELIG\_END\_DT**, for all members. If during the renewal process, a member continues to maintain eligibility, they will have a 12/31/2299 end date, **CLNT\_ELIG\_END\_DT**. This date will not change unless the member loses eligibility.

### *Members Who Are Auto-renewed*

Members who are automatically renewed through the Ex Parte process will have their redetermination date, **REDTRM\_DT** updated to the following year in the weekly member data file. While there is no data field that specifically indicates a member has been renewed through the Ex Parte process, RAEs and MCOs will be able to determine that a member has been renewed by noting a change in the member's renewal date to

the following year in the **REDTRM\_DT** data field. RAEs and MCOs should exclude members who are renewed from outreach communications regarding their renewal and target their outreach to members who still need to take action to remain covered.

Example: REDTRM\_DT: 04/30/2024 = they have already renewed, no need for outreach.

#### *Leveraging Data to Focus Outreach – Renewal Reminders*

The weekly data file from HCPF does not contain a specific field to indicate the status of a member's renewal. It is not possible to determine if a renewal has been submitted by the member or is in the process of being reviewed by an eligibility worker. However, using the data fields within the file, the RAEs and MCOs can determine if a renewal is not yet approved. RAEs and MCOs should leverage the dataset to continue to outreach to members until a member is either approved or denied eligibility.

The Department expects the members to be outreached to in accordance with the member's communication preference. Communication preference can be found in the columns labeled MASS\_COMM\_EMAIL\_SW, EMAIL\_SW, and PRINT\_MAIL\_SW.

Outreach to a member should continue as long as the following three criteria are met:

- **REDTRM\_DT** = Within the next 8 weeks
- **CLNT\_ELIG\_END\_DT** =12/31/2299
- **STOP\_RSN\_DESC**= null/no data

#### *Targeting Outreach by Household*

A head of household may have their email or phone number listed for all other members on the case; as a result, we recommend outreach targeted to the head of household for the entire case. There is an indicator in the data set that shows head of household. This will avoid multiple messages being sent to the same phone number or email address, which could result in that member opting out of e-communications.

#### *Leveraging Data to Focus Outreach – Reason Codes: Reminder vs Transitions in Coverage Messaging*

Once a member has been determined ineligible, the **STOP\_RSN\_DESC** field will be updated with the reason the member's eligibility is being terminated. This field will be null if no eligibility stop date is on record. The "null/no data" response indicates a member is still eligible for coverage. If their renewal date is within the next eight weeks, they need to be included in outreach campaigns.

*Outreach for Marketplace Coverage*

Some RAEs and MCOs will outreach members with the “Over Income” code to encourage them to apply for marketplace coverage at Connect for Health Colorado. Please see the Transitions in Coverage operational memo for additional guidance and messaging, this memo will be published in February 2023.

*Ceasing Renewal Outreach - Field to Identify Approved Members*

Once a member has completed the renewal process and been approved, the **REDTRM\_DT** field will change to the next year’s renewal date. At this point RAE/MCO renewal outreach to the member may cease as the renewal process is complete. Please note that when a member is renewed the eligibility end date, **CLNT\_ELIG\_END\_DT**, does not change.

If a member has not completed and submitted their renewal paperwork by the 15<sup>th</sup> of their redetermination month, **REDTRM\_DT**, there is a system trigger in the eligibility database for non-compliance and the member’s eligibility end date, **CLNT\_ELIG\_END\_DT**, will be updated to reflect their end date. ***The member still has two weeks to submit their paperwork before losing coverage.***

RAEs and MCOs should reference the PHE Unwind Specification document for a complete list of all Stop Reason Values, to determine if eligibility loss may be the result of failure to submit completed paperwork to the Department.

**Sample 10 Week Member Renewal Timeline REDTRM\_DT = 05/31/2023**

|           |              |   |
|-----------|--------------|---|
| Week 1    | Mar 20 - 24  | Renewal Packets received by members   |
| Week 2    | Mar 27 - 31  | Department conducts initial e-communication to members via text, email and Health First Colorado app push notification throughout the first several weeks.  |
| Weeks 3-5 | April 3 - 28 | <p><b><u>RAE Renewal Reminder Outreach to All Members who have not yet taken action on their renewal</u></b></p> <ol style="list-style-type: none"> <li>1. <b>REDTRM_DT</b> = 05/31/2023</li> <li>2. <b>CLNT_ELIG_END_DT</b> = 12/31/2299</li> <li>3. <b>STOP_RSN_DESC</b>= null/no data</li> </ol> <p>Note: This outreach excludes Ex-Parte and those already renewed. Cease outreach to members whose renewal dates</p> |

|           |             |   |
|-----------|-------------|---|
|           |             | have been updated to the next year as they completed the process and have been approved.  |
| Week 4    | April 10-14 | Mailed Renewal Reminder Letter from Enrollment Broker<br><br>Note: this mailing will go to members who have not yet taken action on their renewal, excludes those already renewed.  |
| Week 7    | May 1-5     | RAE Outreach preferably via phone call to Members at High Risk of losing coverage for not taking action on their renewal  |
| Week 8    | May 8 - 15  | Due date for member return of renewal packet - May 5th<br><br>If member has not completed renewal packet due May 15th<br><b>CLNT_ELIG_END_DT</b> will change from 12/31/2299 to 05/31/2023  |
| Week 9-10 | May 18-31   | <b><u>Optional: RAEs to send follow up communication</u></b> to all members with stop reason code of "over income" directing them to Connect for Health Colorado. See "Transitions in Coverage Memo" for messaging in accordance with communication preferences.<br><br><b>REDTRM_DT = 05/31/2023</b> |

\*Note: these sample dates do not take into account weekends and holidays

### High Risk Members:

The RAEs are expected to make targeted outreach to high risk members as outlined in their Continuous Coverage Unwind Plans using the guidance above. High risk members include:

- Those who will likely lose Medicaid or CHP+ coverage because they have not completed their renewal and returned it
- Those with serious health conditions who have a care plan and those with a medical diagnoses that warrant continuity of care (defined by the RAE/MCO using the data below) *and* have not completed their renewal and returned it

The weekly data file includes codes for specific high-risk diagnoses (listed below). In addition, there are two fields that indicate the number of claims for the member in the last 12 months, **SPECIALIST\_CLAIMS**, and the last 3 months, **SPECIALIST\_CLAIMS\_3\_MTH**. This data can be used to identify high-risk members.

#### High Risk Member Codes

|                           |   |
|---------------------------|---|
| Heart Attack'             | Asthma'   |
| Stroke'                   | Chronic Obstructive Pulmonary Disease (COPD)'                 |
| Pneumonia'                | Chronic Liver Disease'  |
| Cardiac Dysrhythmia'      | Alzheimers'   |
| Diabetes'                 | Dementia'   |
| Rheumatoid Arthritis'     | HIV/AIDS'   |
| Juvenile Arthritis'       | Capitated BH Mental Health' (claim for BH Services)           |
| Other Arthritis'          | Capitated BH Substance Use Disorder' (claim for SUD services) |
| Osteoarthritis'           | Fracture'   |
| Hypertension'             | Cancer'   |
| Congestive Heart Failure' | Septicemia'   |
| Congestive Heart Disease' | Organ/Tissue Transplant'                                      |
|                           | Pregnancy'  |

#### Attachment(s):

[OM 22-027](#) - RAE Communication Plans

[HCPF OM 23-005](#) - Continuous Coverage Unwind Member Communications: Regional Accountable Entity & Health Plan Member Communication Coordination Overview

[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

PHE Unwind Specification Document - includes denial codes

[Update Your Address Campaign Toolkit](#)

[Get Ready for Renewals Toolkit](#)

[Take Action on Your Renewal Toolkit](#)

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