



## OPERATIONAL MEMO

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<b>Title:</b> Telephonic Signatures for Renewals	<b>Topic:</b> Telephonic Signatures for Renewals
<b>Audience:</b> Eligibility Sites, County Departments of Human/Social Service, Medical Assistance (MA) Sites, and Eligibility Application Partners (EAP)	<b>Sub-Topic:</b> The requirements for offering, recording, and storing a telephonic signature for MA program renewals within the Colorado Benefits Management System (CBMS).
<b>Supersedes Number:</b> N/A	<b>Division:</b> Eligibility Division
<b>Effective Date:</b> June 1, 2023	<b>Office:</b> Medicaid Operations Office
<b>Expiration Date:</b> June 1, 2025	<b>Program Area:</b> Eligibility Policy
<b>Key Words:</b> Telephonic, Signature, Voice, Verbal, Attestation, Recording, Application, Renewal, Non-Magi, MAGI, CHP+	
<b>Legal Authority:</b> 42 C.F.R 435.907(a) and (f)	
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<b>Approved By:</b> Marivel Klueckman	

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### Purpose and Audience:

The purpose of this Operational Memo is to provide Eligibility Sites (county departments of human/social service and Medical Assistance (MA) Sites, and Eligibility Application Partners (EAP)) (referred to in this memo as “agency” or “agencies”) the requirements for offering, recording and storing a telephonic signature for MA program renewals within the Colorado Benefits Management System (CBMS). This guidance is intended for all Eligibility Workers and Supervisors. Please share this memo with anyone who works with Health First Colorado/CHP+ members.

### Information:

Per federal regulations (42 C.F.R 435.907(a) and (f)), states are required to provide several avenues through which an applicant or member can apply for Medical

Assistance coverage and sign under penalty and perjury. These include by mail, in person, online, and over the telephone.

Federal regulation (42 C.F.R. §435.916(a)(3)(i)(B)) also requires a member's signature at renewal for continued Medical Assistance coverage. Effective February 2022, a signature form was added to the Medical Assistance renewal packet. Members who receive a renewal packet are required to sign and return the renewal form signature page. Members can submit the renewal form signature page through the following modalities: online through CO.gov/PEAK, on the Health First Colorado mobile app, on paper by mailing, faxing, or by bringing the signed renewal form to their local county department of human/social services. In addition to those modalities, a member may provide a verbal signature over the phone (telephonic signature) by verbally attesting to the completed renewal. All verbal attestations require an audio recording to be maintained to constitute a valid telephonic signature.

#### **Telephonic Signature for MA Renewals:**

Effective March 2023, Eligibility Sites have the ability to accept telephonic signatures for renewals in CBMS. Signatures can be captured on the day a member submits a renewal or at a later date.

A case comment will auto populate in CBMS when an Eligibility Worker performs a telephonic signature for a renewal.

#### **Eligibility Site Requirements:**

Members that want to utilize the telephone to complete the renewal signature will be directed to contact their Eligibility Site. The Eligibility Site is required to accept the inbound call and perform the telephonic signature recording.

Eligibility Sites are required to establish business processes, so they are prepared to perform outbound calls to members and obtain renewal signatures telephonically when a renewal packet is missing the signature.

#### **Signature Recording & Storage:**

When an Eligibility Site performs a telephonic signature for a renewal, the site is required to record the member's signature by using the state administered Google Meet platform or the Eligibility Site's technology solution. Eligibility Workers must follow the scripts within CBMS to obtain and record the member's verbal attestation telephonically which includes verbal attestation of the signature under penalty and perjury. A member must connect via video or dial in directly to the meeting invite sent to them by the Eligibility Worker, and the recording must occur via the

technology solution. Eligibility Sites can reference the steps outlined in the web-based training on COLearn.

All verbal attestation recordings must be saved to the case in CBMS. Eligibility Sites that record telephonic signatures on their technology solutions must ensure their solution is mapped to CBMS.

Telephonic signatures will be retained in CBMS for a total of three years from the date the case closes and/or indefinitely while the case is open. If there are other situations when a recording needs to be retained for more than three years, Eligibility Sites shall download the telephonic signature recording and store them according to the Eligibility Site's protocols.

**Resources:**

The Telephonic Signature - External Platform Enhancements (CPPM-6778) project was part of the February 2023 build and went into production on February 11, 2023. That project enhanced CBMS logic to enable telephonic signature for MA renewals. The February 2023 Project Release Notes\_ Telephonic Signature CPPM 6778 offer valuable details.

The telephonic signature web-based training (WBT) on COLearn was updated to incorporate the new system features developed with the CPPM 6778 project. In CoLearn, the training is listed as 'CDHS & HCPF Telephonic Signature'. It can be found by typing the name in the search box on CoLearn.

All requirements outlined in this Operational Memo are subject to Department-level Quality Assurance (QA) reviews and Management Evaluation (ME) reviews 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 impact the eligibility sites ME review when selected.

**Attachment(s):**

None

**HCPF Contact:**

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