



## OPERATIONAL MEMO

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<b>Title:</b> FY 2023-24 HCPF County Administration Public Health Emergency (PHE) Allocation and Funding Guidance	<b>Topic:</b> County Administration Funding
<b>Audience:</b> County Departments of Human/Social Services	<b>Sub-Topic:</b> Public Health Emergency
<b>Supersedes Number:</b> HCPF OM 20-058, HCPF OM 21-067, HCPF OM 21-084	<b>Division:</b> Partner Relations and Administration
<b>Effective Date:</b> July 1, 2023	<b>Office:</b> Policy, Communication & Administration
<b>Expiration Date:</b> June 30, 2024	<b>Program Area:</b> County Administration Fiscal
<b>Key Words:</b> Funding, PHE, Staff, Public Health Emergency, Allocation	
<b>Legal Authority:</b> FY 22-23 Supplemental/FY 23-24 Budget Amendment (S-06/BA-06): PHE County Administration Funding	
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### Purpose and Audience:

The purpose of this Operational Memo is to communicate information to county departments of human/social services relating to the FY 2023-24 county administration appropriation for the COVID-19 Public Health Emergency (PHE). The appropriation is provided to counties to manage the unwinding of the Continuous Coverage workload resulting from the PHE. This Operational Memo provides guidance regarding funding and staffing relating to this appropriation.

### Information:

In May 2023, the Department of Health Care Policy and Financing (HCPF) received approval from the Joint Budget Committee for county administration totaling

\$21,010,078; this appropriation is specific to FY 2023-24. The term-limited funding to counties is for additional staff capacity for the Continuous Coverage eligibility renewals, appeals and customer service, or to continue and/or expand existing staffing supports, such as overtime and other innovative solutions as approved by HCPF.

Effective May 11, 2023, the Centers for Medicare and Medicaid Services (CMS) has declared an end to the PHE that was initiated in March 2020 due to the COVID-19 pandemic. In addition, HCPF has received formal notification from CMS on the ending of the Continuous Coverage provisions for Medical Assistance. With the end of Continuous Coverage, counties are responsible for reviewing eligibility of all members who have remained enrolled (known as “locked in”) during the PHE and redetermining their eligibility; this will be accomplished over a 12-month period starting in May 2023. Renewals will be based on the member’s annual renewal date.

Counties are expected to ensure every member that goes through the renewal process is fully completed. This includes the need to follow up with the member, if needed, to complete documentation for an accurate eligibility determination and to resolve any issues that may be encountered. In addition, counties are responsible for meeting federal and state requirements for the state and county-level appeals requested by members resulting from the renewal process.

#### Guidance for New or Existing PHE Staff

The Department is providing PHE funding guidance to reflect the ending of the PHE and the revised federal timelines. Counties are expected to:

1. **Extend Term of Hire:** Put the mechanisms in place to extend the term of hire for any newly onboarded PHE eligibility technicians. The anticipated end-date should be extended to June 30, 2024.
2. **Manage:** End of Continuous Coverage Workload: Eligibility renewals began in May 2023. The priority for staff paid through PHE funding should be processing renewals, working renewal backlog, resolving appeals related to the end of continuous coverage and ensuring adequate staffing for call centers and customer service functions.

#### Guidance for PHE Staff Not Already Hired

On June 30, 2024, the 14-month eligibility unwind will be completed. The Department is now providing PHE funding guidance to reflect the ending of the PHE and the revised federal timelines. The Department is advising counties regarding:

1. **Continue Hiring Efforts:** Counties should continue their efforts to hire the number of staff needed. Any changes in the number or type of staff must be reflected in the county's approved PHE Staffing Plan.
2. **Extended Term of Hire:** Put the mechanisms in place to extend the term of hire for any **not-yet hired** PHE eligibility technicians. The anticipated end-date should be extended until June 30, 2024.

#### Guidance for Counties Not Hiring Additional Staff

If the county communicated in their PHE Staffing Plan that they will manage the continuous coverage renewals and the end of the PHE through increased overtime or other staffing solutions and is currently expending a portion of their funding on staff, that staff time can be directed to process renewals, backlog, appeals and customer service functions, as stated above under "Guidance for Newly Onboarded PHE Staff."

#### General Guidance on PHE Funding and Updating PHE Staffing Plans

Expenditures are continuously monitored and those county staff who are paid using PHE funds must focus their work efforts going forward as described above. Any request by the county to expend PHE funds must be pre-approved by the Department and documented in the county's PHE Staffing Plan. Department approval of expenditures are limited to those costs associated with the ending of the PHE and Continuous Coverage, unless otherwise communicated by HCPF. Changes to the county's PHE Staffing Plan must be submitted to the County Relations [webform](#) (Ticket type "County Finance") or [HCPF\\_countyrelations@state.co.us](mailto:HCPF_countyrelations@state.co.us).

#### Coding Expenditures in the County Financial Management System (CFMS)

The coding of eligible expenditures must occur in CFMS using the appropriate codes listed below.

Enhanced Match: M216.5405

Non-Enhanced Match: M215.5400

Continuous Coverage Appeals: M217.5405

*Note: Appeals are a non-enhanced match activity*

#### **Attachment(s):**

FY 2023-24 HCPF Public Health Emergency County Administration Allocations

**HCPF Contact:**

[County Relations webform](#) or [HCPF\\_CountyRelations@state.co.us](mailto:HCPF_CountyRelations@state.co.us)