



## OPERATIONAL MEMO

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<b>Title:</b> Medical Assistance Returned Mail Process	<b>Topic:</b> Returned Mail
<b>Audience:</b> Eligibility Sites	<b>Sub-Topic:</b> CRMC
<b>Supersedes Number:</b> HCPF OM 19-045	<b>Division:</b> Eligibility
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<b>Expiration Date:</b> July 7, 2025	<b>Program Area:</b> Eligibility Policy
<b>Key Words:</b> Returned Mail, Mail, Eligibility	
<b>Legal Authority:</b> 42 C.F.R. § 435.916(d), 431.17(b)(1)(v), §435.403, 435.914(b)(3), 435.916(d), 431.213(d), 431.231(d)	
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<b>Approved By:</b> Lisa Pera	

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### Purpose and Audience:

The purpose of this memo is to provide guidance to Eligibility Sites (County Departments of Human/Social Services, Medical Assistance and Eligibility Application Partner sites) on the returned mail process. This will replace the medical assistance process detailed in Operational Memo 19-045 Medical Assistance Returned Mail Process, released by the Department on October 1, 2019.

### Information:

As of June 2021, all CBMS generated Medical Assistance correspondence that is undeliverable (“returned mail”) is routed to the Consolidated Return Mail Center (CRMC) with certain exceptions as described below in “CRMC Responsibilities and Processes for Special Populations.”

### CRMC Returned Mail Responsibilities and Processes

The CRMC collects returned mail from the US Post Office Monday through Friday.

Mail is scanned and uploaded to CBMS within 24-48 hours.

For applicants and/or members who have opted into electronic communications, scanning triggers a text message and/or email informing the applicant and/or member that mail has been returned and requesting they make contact to update their information.

After the returned mail is scanned, it is distributed to CRMC Mail Technicians to begin outreach to confirm mailing addresses.

The CRMC will make a minimum of three outreach attempts, using phone and email information available in CBMS. Notes describing outreach attempts are entered in case comments.

If the phone number contact information is valid, a voicemail message will be left for the applicant and/or member to please update their mailing address by contacting the CRMC, calling the county DHS office or using the PEAK app.

If the CRMC confirms the applicant and/or member's mailing address through outreach attempts, they will update CBMS, run EBDC, and case comment. EBDC will cause returned Medical Assistance correspondence to be re-sent.

If returned mail contains a USPS "Yellow sticker" with an in-state forwarding address, CBMS will be updated with that address. [\*\*Updating the address without member confirmation is only allowed during the Public Health Emergency COVID Unwind, under a CMS E-14 waiver.\*\*]

If the applicant and/or member address cannot be updated after outreach attempts, the CBMS case record will be updated to "Whereabouts Unknown." Cases updated to "Whereabouts Unknown" will close, with 10-day noticing issued via CBMS. [\*\*During the Public Health Emergency COVID Unwind, CBMS logic will not terminate a locked-in member until the case has gone through the renewal process.\*\*]

## **CRMC Responsibilities and Processes for Special Populations**

Special populations require additional steps when reviewing the case for returned mail. The CRMC will receive return mail for some special populations, while others will be directed to eligibility sites.

**Long-Term Care:** For Long-term Care members, if the outreach attempts are unsuccessful, the CRMC will refer the case to the appropriate eligibility site for

additional follow up. The member's classification will remain "Blank" so the overnight batch process will not process the member as "Whereabouts Unknown."

**The following member statuses will not go to the CRMC, and instead will be sent to the eligibility site directly:**

Address Confidentiality Program (ACP)

Former Foster Care

Homeless Cases

SSI Mandatory

## **Eligibility Site Responsibilities and Processes for Special Populations**

Beginning immediately, eligibility sites must adopt procedures in accordance with the following requirements. Below are special populations that will require additional steps when reviewing the case for returned mail. For these cases, eligibility sites have familiarity that is not available to the CRMC. For that reason, the following special populations require additional attention by the eligibility site.

**Long-Term Care:** Eligibility sites should reach out to the case management agency and/or the member's nursing facility to gather updated contact information. Document in case comments all actions taken when contacting the case management agency and/or nursing facility. The Eligibility site should also check available interfaces and reports (SVES, Med Span Error Report, etc.) for additional insight. If the site does not receive updated contact information, the site should still leave the classification "Blank" so the case will not close while the member's whereabouts are being verified. The Site should continue to reach out to the member or authorized representative, case management agency and/or member's nursing facility until they are able to gather updated information. Follow up is recommended to be done on a monthly basis. The case will ultimately close in the renewal process if the member does not return the renewal packet (failure to complete the renewal process). When the member's whereabouts have been verified, sites should update the case accordingly.

Please note: For Medical Assistance, a person who is out of state remains a Colorado resident if they intend to return to the state. ***The site must confirm whether the member intends to return before changing residency status.***

**Address Confidentiality Program (ACP):** For cases that are ACP participants, eligibility sites are required to accept the ACP Authorization Card as the member's legal address. This address should replace all addresses that are currently being used

in all existing and new files and systems. Eligibility sites may contact the ACP to verify current program enrollment.

ACP

[acp@state.co.us](mailto:acp@state.co.us) (303) 866-2208

**Former Foster Care:** Qualifying former foster care youth from Colorado have guaranteed Health First Colorado (Colorado's Medicaid Program) coverage up until the age of 26. Health First Colorado extends medical assistance to age 26 for youth who aged out of the foster care system and were enrolled in Medicaid. This extension includes youth who were in foster care in another state. When reviewing a Former Foster Care case for returned mail, follow the steps outlined below in "Information/Procedure" for updating the address if one is provided, but only close a case if it has been verified that they are no longer a Colorado resident. Document actions taken in case comments. For more information regarding Former Foster Care click [here](#).

**Homeless:** A person is considered "homeless" for the purposes of eligibility determination if they do not have a permanent dwelling or do not have a fixed address. Individuals applying and/or receiving Medical Assistance are not required to have a fixed address to receive Medicaid as long as they declare they are a Colorado resident. Eligibility sites should be particularly cautious about using "Whereabouts Unknown" for this population, instead attempting to determine if the member is no longer a resident of the state or has otherwise become ineligible. Inquiries can include checking PARIS to see if the member is receiving benefits in another state or reviewing the Prisoner match report. If the eligibility site does not find anything questionable regarding the applicant or member's Colorado residency or eligibility, the site can mark them for general delivery.

Please note: For Medical Assistance, a person who is out of state remains a Colorado resident if they intend to return to the state. ***The site must confirm whether the member intends to return before changing residency status.***

**SSI Mandatory:** For cases that have SSI Mandatory individuals, the eligibility site must check SVES for updated information. If SVES returns a different address, the site should update CBMS to reflect the SVES address. If SVES does not return a different address, the site must contact the local Social Security office to gather updated information, or to notify SSA that the member's address appears to be invalid. If the SSA office has the same information as the eligibility site, they should follow the steps outlined below in "Information/Procedure for Eligibility Sites."

## Information/Procedure for Eligibility Sites:

Beginning immediately, eligibility sites must adopt procedures in accordance with the following requirements.

Following are specific return mail scenarios and actions to be taken with each scenario:

1. Returned mail that is un-forwardable (post office sticker indicating no forwarding address, no post office sticker, or return to sender sticker):
  - a. Attempt to reach the member receiving Medical Assistance through the contact method(s) provided by the member.
    - i. If you can reach the member, update the case appropriately with the new address.
      1. The current residency of the member must also be verified. An individual may have an out of state address but be considered a Colorado resident if they intend to return to Colorado. ***The site must confirm whether the member intends to return before changing residency status.***
        - a. If an individual is no longer a Colorado resident, update the residency status. The address and residency change will close the case per current system logic.
        - b. If an individual indicates they intend to return to Colorado, they will meet the Colorado residency requirement and may remain eligible regardless of the out of state address.
      - ii. If you are unable to reach the member, document the date, time, and means you took to contact the member, update the “whereabouts unknown” field to “yes” and enter the effective begin date.
        1. Per current system logic, this will close the case.
    - b. Retain the envelope (according to the eligibility site’s established business process for file retention) indicating no forwarding address, and enough of the document to correctly identify the case, date sent, and document sent. This will be used for auditing purposes.
    - c. If the whereabouts of the member become known while the member is still eligible for services, the case must be reopened (per current rescind process guidance). Otherwise, a new application is required.
    - d. Record all actions taken within case comments.

Supporting Authority: 42 C.F.R. § 435.914(b)(3), 435.916(d), 431.213(d), 431.231(d), 431.17(b)(1)(v).

2. Returned mail with forwarding address:
  - a. Attempt to reach the member receiving Medical Assistance through the contact method(s) provided by the member.
    - i. If you can reach the member, update the case appropriately with the new address.
      1. The current residency of the member must also be verified. An individual may have an out of state address but be considered a Colorado resident if they intend to return to Colorado.
        - a. If an individual is no longer a Colorado resident, update the residency status. The address and residency change will close the case per current system logic.
        - b. If an individual indicates they intend to return to Colorado, they will meet the Colorado residency requirement and may remain eligible regardless of the out of state address.
      - ii. If you are unable to reach the member, document the date, time, and means you took to contact the member, and update the case appropriately.
        1. The returned mail and inability to contact the member will be considered as whereabouts unknown for the member. Update the “whereabouts unknown” field to “yes” and enter the effective begin date.
          - a. Per current system logic, this will close the case.
    - b. Retain the envelope (according to the eligibility site’s established business process for file retention) indicating the forwarding address and enough of the document to correctly identify the case, date sent, and document sent. This will be used for auditing purposes.
    - c. Record all actions taken within case comments.
    - d. During COVID Unwind, if returned mail contains a USPS “Yellow sticker” with an **in-state** forwarding address, the Eligibility site can update the member’s address with the “Yellow sticker” address without member confirmation. [**\*\*Updating the address without member confirmation is only allowed during the Public Health Emergency COVID Unwind, under a CMS E-14 waiver.\*\***]

Supporting Authority: 42 C.F.R. § 435.916(d), 431.17(b)(1)(v), §435.403(a).

### **Action To Be Taken:**

Eligibility Sites are required to have a process for managing returned mail. The process should incorporate the procedures outlined in this memo.

**Attachment(s):**

None

**Department Contact:**

[Medicaid.Eligibility@state.co.us](mailto:Medicaid.Eligibility@state.co.us)