



OPERATIONAL MEMO

Title: Cover All Coloradans Guidance	Topic: Eligibility Process
Audience: Eligibility Sites, County Departments of Human/Social Services, Medical Assistance (MA) Sites, and Eligibility Application Partners (EAP)	Sub-Topic: Eligibility
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Purpose and Audience:

The purpose of this Operational Memo is to inform eligibility sites of the Department’s adoption of eligibility changes in accordance with House Bill 22-1289 Health Benefits for Colorado Children and Pregnant Persons, also known as Cover All Coloradans. This memo includes eligibility and operational guidance for all applicable Medical Assistance programs as they relate to requirements of the house bill. Please share this memo with all eligibility staff, supervisors, and outside agencies, as appropriate.

Information:

Beginning January 1, 2025, House Bill 22-1289, also known as Cover All Coloradans, requires the Department to provide full coverage health benefits for all children through their 19th birthday and individuals that are currently pregnant or in their postpartum period who do not meet the U.S. citizenship or qualified non-citizenship

criteria for Health First Colorado (Medicaid) or CHP+, but do meet all other eligibility requirements.

Emergency Medical Services (EMS) life/limb threatening or the need for Reproductive Health Care Services (RHCS) criteria will no longer be required for this population to be considered for Health First Colorado (Medicaid) or CHP+.

Applicant/Member Populations Affected

As of January 1, 2025, the following populations are affected by this citizenship requirement change:

1. People who are pregnant as of January 1, 2025 and/or
2. People who are within 12 months of their postpartum period which began on or after January 1, 2025 and/or
3. Children (age \leq 19) whose 19th birth month is January 2025 or greater

Individuals that fall into one or more of the populations listed above must still meet and/or continue to meet all eligibility criteria for the applicable Medical Assistance program except for citizenship or qualified non-citizenship requirements as established in 10 CCR 2505-10 and 8.100.3.G.

The following Medical Assistance programs allow for Cover All Coloradans

MAGI Programs

- MAGI Children
- MAGI Pregnant
- 4-Month Extended
- Transitional
- Psych<21

Long-Term Care Programs

- Home and Community Based Services (HCBS)
- Nursing Facility/Institutionalized

Medicaid Buy-In Programs

- Children with Disabilities (CBwD)
- Working Adults with Disabilities (WAwD) (including those with additional HCBS)

Child Health Plan *Plus* (CHP+) Programs

- CHP+
- CHP+ Prenatal

Presumptive Eligibility Programs (PE)

- MAGI Child
- MAGI Prenatal
- CHP+ Child
- CHP+ Prenatal

System Updates

In October 2024, CBMS was updated with changes necessary to comply with HB 22-1289. CBMS Project CPPM-8235 was implemented with an effective date of January 1, 2025. This project updates eligibility criteria for Medical Assistance to allow children and individuals that are currently pregnant or in their postpartum period who meet all eligibility requirements with the exception of meeting U.S. citizenship or qualified non-citizenship criteria to be placed in the Medical Assistance program they meet criteria for as mentioned above.

This population will be identified as Cover All CO (one of 6 categories listed below) in their eligibility span data sent to the Medicaid Claims System - interChange. This will allow the member to receive full Medical Assistance coverage.

- Medicaid Pregnant
- CHP+ Pregnant
- Medicaid Postpartum
- CHP+ Postpartum
- Medicaid Child
- CHP+ Child

Even though meeting EMS &/or RHCS is no longer required, if individuals that meet the Cover all CO criteria report the need for EMS &/RHCS, they will still be identified as such and will receive full coverage benefits.

Retroactive Medical Assistance and Initial Enrollment

System changes went into effect during the October 2024 build. CBMS end users may notice the Cover All Coloradans indicator as early as October 2024. However, prior to January 1, 2025, they can only receive coverage for currently available programs such as EMS and RHCS. Although the member may be approved for Cover All Coloradans, coverage is not available prior to the program effective date of January 1, 2025.

Retroactive Medical Assistance can be requested for Cover All Coloradans; however, it cannot be back dated earlier than January 1, 2025.

One-Time Mass Change Update

In November 2024, The Department will conduct a one-time mass change update in CBMS with Project CPPM-9940. This update will capture members who meet Cover All Coloradans criteria and are currently Limited to Emergency Medical Services (EMS) and/or Reproductive Health Care Services (RHCS). The member's eligibility spans will be updated to include the applicable Cover all CO information (as outlined above) with an effective date of January 1, 2025, and transmit to the interChange. Because these members are already established in CBMS under Limited to EMS/RHCS, their eligibility span will display as both Limited to EMS/RHCS and Cover All CO. Cover All Coloradans is in addition to any coverage the member may already have. These members will be notified with a letter of their approval for full medical coverage due to meeting criteria for Cover All Coloradans. This update will allow for Cover All Coloradans coverage to begin on the effective date of the program which is January 1, 2025.

Renewal and Pending Verifications

There are no changes to the renewal or verification processes for these members. Members will continue to go through the normal renewal process (including the ex parte process) and provide verification in accordance with current program policy.

Applications

Members may continue to apply for Medicaid or CHP+ via all currently available modalities (PEAK, paper application, and shared paper application). The MA Only and Single Purpose applications will be updated to better serve this population.

In December 2024, PEAK will be updated with Project CPPM-9762 to update applicable PEAK application questions for the Cover All Coloradans population.

Reporting

Applicable Dashboards have been updated to include the Cover All CO field option for filtering.

A new COGNOS report will be available to identify all members assigned to your site that are eligible in a Medical Assistance program due to meeting Cover All CO criteria.

Report Name: Active MA Cover All Colorado Members
Report Location: MA Reports
Report Frequency: Monthly (3rd of each month)

This report is available to pull monthly or on an ad hoc basis as needed.

Action To Be Taken:

Review the following Training Resources:

The Staff Development Division (SDD) published a build training summary and a new Web-Based Training (WBT):

- Cover All Coloradans Web-Based Training
- Cover All Coloradans October 2024 Build Summary

Project Release Notes were distributed on October 9, 2024, and a corresponding Knowledge Transfer Call was held on October 10, 2024.

Explore other resources:

<https://www.healthfirstcolorado.com/cac>
<https://hcpf.colorado.gov/coverallcoloradans>

Attachment(s):

None

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