



OPERATIONAL MEMO

Title: State Requirements for Eligibility Site Medical Assistance Training	Topic: Administrative Policy
Audience: County Departments of Human/Social Services and Eligibility Sites	Sub-Topic: County Relations
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Purpose and Audience:

The purpose of this Operational Memo is to promulgate sub-regulatory requirements relating to required initial hire, ongoing and annual trainings for staff at county departments of human/social services, Medical Assistance and Eligibility Application Partner Sites (herein referenced as “Eligibility Sites”) to comply with Medical Assistance (MA) training requirements as referenced in 10 CCR 2505-5 1.020.4.3. Trainings related MA eligibility determinations are offered by the state to Eligibility Sites through the Health Care and Economic Security Staff Development Division (SDD). The SDD develops and implements training plans and provides instruction to staff who will, or currently have, access to the Colorado Benefits Management System (CBMS).

Information:

Regulatory requirements at 10 CCR 2505-5 1.020.4.3 establishes responsibility for staff completion of training and other training requirements. The Department of

Health Care Policy and Financing (HCPF) is providing guidance to further define these categories of required training and actions eligibility sites can take to ensure compliance.

Registration in the SDD's Learning Management System

All eligibility site staff who have been granted access to CBMS are required to have an active account in the SDD's Learning Management System, also known as COLearn. This includes existing and ongoing staff whose tenure precedes the usage of COLearn.

Eligibility site staff who have read-only CBMS access for duties unrelated to eligibility determination are only required to complete the appropriate read-only CBMS training plan as detailed by the SDD.

Adequate Initial Hire Training

Eligibility Site staff appointed to fulfill duties relating to the administration of Medical Assistance must complete adequate initial hire training, also referred to as new hire training.

Adequate initial hire training must:

- include the completion of all training courses listed in the SDD training plan appropriate for staff who are appointed to fulfill duties relating to the administration of Medical Assistance programs,
- include one to two weeks of nesting between courses, and
- Program certification must be completed by all new employees prior to eligibility processing occurring.

Staff who do not complete the minimum required training by or before the deadline may lose CBMS access until they have completed the necessary training(s).

Required Annual and Ongoing Training

Staff appointed to fulfill duties relating to the administration of Medical Assistance and who have direct contact with individuals, applicants or members, or who supervise staff who have direct contact with individuals, applicants or members, must complete ongoing training specific to Medical Assistance on an annual basis.

Ongoing training, as defined in partnership by the SDD and HCPF, will be considered required training for all users who have access to CBMS. These trainings may include:

- Instructor or Virtual-led Sessions

- Web-Based Trainings
- CBMS Build trainings
- Webinars

Designated ongoing training as defined by the SDD and HCPF must be completed by any staff appointed to fulfill duties relating to the administration of Medical Assistance.

Staff who only have read-only access to CBMS and have completed the required SDD read-only training are not required to complete ongoing/annual training relating to eligibility determination, however individuals with read-only access may need to complete other system related trainings.

HCPF may also require an eligibility site to complete a specific training course in response to accuracy, performance, or customer service compliance issues. In such a case, the specific training course will be considered required ongoing training. Due dates for ongoing trainings will be set by the SDD and HCPF. Counties that are found to have staff who did not complete the required ongoing trainings by or before the deadline may be cited with a finding related to staff training during a management evaluation or desk review or other compliance review and may be issued a Management Decision Letter as a result of non-compliance.

Civil Rights/Non-Discrimination and Disability Competency Training

Staff appointed to fulfill duties relating to the administration of Medical Assistance and who have direct contact with individuals, applicants or members, or who supervise staff who have direct contact with individuals, applicants or members, must complete annual training related to civil rights, non-discrimination, and disability competency, as outlined in 10 CCR 2505-5 1.020.8 and [HCPF OM 23-003](#), or whichever later Operational Memo supersedes HCPF OM 23-003.

Training will be available in the SDD's Learning Management System as two specific Trainings:

1. Civil Rights, and
2. Disability/Cultural Awareness

The site director or their designee is required to coordinate completions of training to all applicable staff and supervisors. Completion deadlines will be issued by the SDD and HCPF, and counties that have staff who do not complete the required annual training by or before the deadline may be cited with a finding related to staff training and may be issued a Management Decision Letter for non-compliance.

Eligibility Site Trainers and Materials

Required trainings listed above, particularly those relating to eligibility determination, must be obtained through the SDD or an SDD-certified trainer.

Eligibility site-created trainings must be submitted for approval to the SDD and HCPF prior to use and/or facilitation of the materials. Training must be submitted to soc_staffdevelopment@state.co.us for approval and will require a minimum of 14 calendar days for approval. Eligibility sites must track all eligibility site-created training, and HCPF reserves the right to request eligibility site-created trainings for review at any time.

Additional Training requirements

County Department Director must complete an onboarding training for Medical Assistance administration, to be provided by HCPF, within six (6) months of the effective date of appointment.

Non-Compliance with Training Requirements

The County Department and HCPF shall ensure that eligibility sites comply with the training requirements as required per 10 CCR 2505-5 1.020.4.3 and outlined in this memo. Failure to comply with these requirements will result in the issuance of a non-compliance notice, known as a Management Decision Letter (MDL). This process is outlined in 10 CCR 2505-5 1.020.14.

The following instances of non-compliance will result in the issuance of an MDL, requiring the eligibility site to create either an Improvement Action Plan or Corrective Action Plan as requested by HCPF:

- If the eligibility site does not ensure new staff complete adequate initial hire trainings by the deadlines as defined and required by the SDD and HCPF.
- If the eligibility site does not ensure employees complete the required ongoing trainings by the deadline as defined and required by the SDD and HCPF.
- If an eligibility site does not ensure employees complete required annual trainings relating to Civil Rights/Non-Discrimination and Disability Competency, by the deadline as defined and required by the SDD and HCPF.
- If the eligibility site has users with access to CBMS but no corresponding COLearn accounts.
- If the eligibility site allows trainings by a non-SDD certified trainer or uses non-SDD approved materials.

Eligibility Site Staff Exemptions from Training Requirements

In situations where eligibility site staff cannot comply with training requirements due to exceptional circumstances, such as medical leave, temporary reassignment from regular duties, or other circumstances outside of the staff's control, the eligibility site can utilize the HCPF exemption process. The exemption process allows for the eligibility site to request specific staff be exempted from training requirements for a specific timeframe. The exemption is not to exceed six months without Department approval. If the exemption is approved, those specific eligibility site staff will not be considered as non-compliant with training requirements. **Exemption requests should only be submitted as needed and are not required to be requested on an annual basis.**

To request an exemption for specific staff, eligibility sites can email HCPF_CountyRelations@state.co.us and SOC_StaffDevelopment@state.co.us and include:

- The full name and title of the specific staff for which exemption is being requested,
- the reason for exemption, and
- the timeframe for which exemption is being requested, not to exceed six months

HCPF will notify the eligibility site of the exemption request within ten (10) business days of the request.

Action To Be Taken:

Eligibility sites comply with initial and ongoing training requirements for the Medical Assistance Program.

Definition(s):

Eligibility Site-created training: any information that will be distributed or facilitated to staff regarding the administration of Medical Assistance programs, including CBMS data entry, (desk aids, presentations, tip sheets, guides, etc.) created by the county department.

Nesting Period: the supported training transition into an eligibility determination position following program certification should occur when staff have recently

completed training on a new topic, such as MAGI, non-MAGI, or Long Term Care (LTC) courses. Nesting may include shadowing, over-the-shoulder training, etc.

Attachment(s):

None

HCPF Contact:

Submit a request through the [County Relations webform](#) (ticket type “County Oversight”) or contact HCPF_CountyRelations@state.co.us for requirements relating to this Operational Memo

SOC_StaffDevelopment@state.co.us for training support from the Staff Development Division