Management Evaluation Review Program Guide

Colorado Department of Health Care Policy and Financing

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I. Background and Purpose

Health First Colorado (Colorado's Medicaid program) is a public health care program for Coloradans who qualify. Health First Colorado covers approximately one in four Coloradans, including many with complex health care needs. Nationally, the program is the principal source of long-term care coverage for eligible Americans.

Health First Colorado provides significant financing for hospitals, community health centers, physicians, nursing homes, and jobs in the health care sector. View the impact of Health First Colorado in our <u>County Fact Sheets</u>.

As the federally designated single state agency for the administration of Health First Colorado, the Department of Health Care Policy & Financing (HCPF, or the Department) has a responsibility to conduct oversight activities of all county departments of human/social services and eligibility sites.

The Management Evaluation (ME) Review Program was developed in consultation with counties and eligibility sites statewide, leveraging existing practices from the Colorado Department of Human Services. The goals of the ME Review Program include:

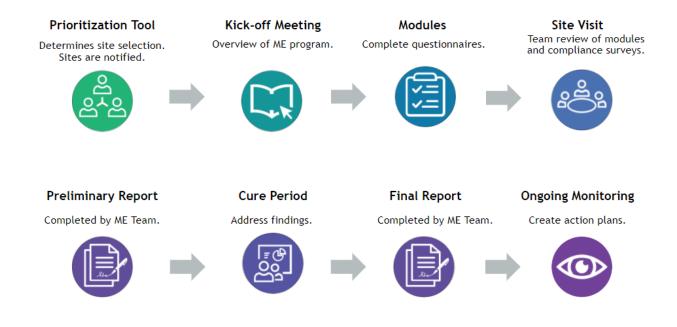
- Support counties and eligibility sites to improve transparency, monitor progress toward program goals, and identify potential best practices.
- Ensure Health First Colorado applicants and members receive proper and timely eligibility determinations.
- Mitigate risk to Health First Colorado funding by ensuring compliance with federal regulations.
- Help the Department fulfill its mission to improve access and outcomes for those we serve while being sound stewards of financial resources.

The ME Review Program replaces components of the Medical Eligibility Quality Improvement Plan (MEQIP). The ME Review Program provides the Department with a consistent framework of oversight across different HCPF program areas, such as administration, eligibility, program integrity and more. The ME Review Program uses process questionnaires and compliance surveys to provide

technical assistance in addressing opportunities for counties and eligibility sites to improve.

II. Process

Management Evaluation Review Process





Alt text: A flow chart of the Management Evaluation Review process. All steps are described below.

Step One: Prioritization

Using a prioritization tool, the ME Team analyzes operations, finance, compliance and performance. These factors will be used to assign an order for reviews of each county and eligibility site. All counties and sites will be reviewed over a designated cycle.

The Department will notify the county or eligibility site director when it is their turn to be reviewed. After the county or site director has been notified, the ME Team will schedule a kick-off meeting.

Step Two: Kick-off Meeting

During the kick-off meeting, the ME Team will provide an overview of the ME Review Program and schedule the site visit.

Step Three: Modules

After the kick-off meeting, the ME Team will email questionnaires to the county or site for distribution to staff. The county or site will generally have three weeks to complete the questionnaires.

ME Review Modules

Process Questionnaire: Completed by counties or sites prior to site visit

- The questions are designed to give insight into business processes and procedures
- Findings may trigger an Improvement Action Plan (IAP) or a Corrective Action Plan (CAP).

Compliance Survey: Conducted by ME Team during site visit

- Results will be marked as "in compliance" or "not in compliance."
- A "not in compliance" mark may trigger an Improvement Action Plan (IAP) or a Corrective Action Plan (CAP).

Step Four: Site Visit

During the site visit, the ME Team will review each module with appropriate county or site staff. See section III for more details about the modules. At the end of the site visit, the ME Team will review next steps, and county or site staff will be able to discuss questions or concerns.

Step Five: Preliminary Report

The preliminary report will include compliance findings and recommendations for process improvements. Both teams will sign the preliminary report. The

signature indicates that the site received the report but does not imply agreement with the findings.

Step Six: Cure Period

The county or site has 30 calendar days to resolve compliance findings. The cure period starts when the preliminary report is sent by the ME Team. During the cure period, the county or site can also rebut findings.

Step Seven: Final Report and Management Decision Letter

After the cure period, the ME Team will issue a final report. The final report includes a summary of the preliminary report, an outline of both cured and uncured findings, and a summary of any rebuttals. A management decision letter (MDL) will be issued for any uncured findings, which is a formal request for the county or site to create an Improvement Action Plan or Corrective Action Plan to resolve the finding.

Step Eight: Ongoing Monitoring

For uncured compliance findings, the site will submit an Improvement Action Plan (IAP) or Corrective Action Plan (CAP). The Department will approve or reject these action plans.

- After the IAP or CAP has been approved, the Department will monitor the site's implementation and progress.
- Further guidance on the Improvement Action and Corrective Action Plans and process, please refer to HCPF Operational Memo OM 21-078.

III. Modules

The ME Program modules (step three) include a compliance survey, a process questionnaire or both. The Department may also request documented policies and procedures. Below are examples of the topics that may be covered in modules.

Leadership: Exploring program management and business processes.

Eligibility Determination: Exploring eligibility determination processes, report utilization, and staff training.

Ongoing Case Maintenance: Examining processes and procedures necessary to manage ongoing caseloads in a timely and accurate manner.

Hearings and Appeals: Covering requirements for hearings and dispute resolution conferences.

Quality Assurance: Evaluating quality assurance processes.

Performance Measures: Examining performance dashboards.

Program Integrity: Exploring the program fraud investigation process, including investigator and staff training, written policy and benchmarks, mandatory reporting, and overpayments.

Communications: Covering feedback regarding member correspondence.

Member Experience: Examining call center processes and call center metrics.

Security/Mailroom: Exploring front desk security procedures and mail handling, including sorting, date stamping, distribution, and processing returned mail.

Confidentiality: Surveying policies and practices that protect member information and other protected data. This survey will be conducted during the site visit and is not included in this guide.

Individual Rights: Surveying policies and practices surrounding non-discrimination and accessibility. This survey will be conducted during the site visit and is not included in this guide.

Training: Examining training practices, including how training is developed, tracked and implemented.

Financial: Desk review performed by the County Auditor (for counties only). This module explores accounting policies and internal controls as they pertain to state and federal financial requirements. The results of this desk review will be delivered to the county by the County Auditor.

IV. Additional Resources

- ME Review website
- Management Evaluation Memo OM 21-005
- Improvement Action Plan/Corrective Action Plan Memo OM 21-078
- Questions to HCPF_MEReview@state.co.us