



COLORADO

Department of Health Care
Policy & Financing

303 E. 17th Avenue
Denver, CO 80203

Reinstatement for Ex Parte Individuals

October 2023

Summary:

CMS is requiring states to perform ex parte renewals at an individual level and reinstate coverage for individuals who were previously determined eligible during ex parte results but terminated because their household failed to sign or return the renewal packet. HCPF is working with the CBMS vendor to retroactively reinstate individuals eligible at ex parte for May, June, July, and August 2023.

CBMS Project Summary:

- CBMS Project “Medicaid Renewal Ex-Parte at the Individual Level CPPM-8556” was implemented the weekend of October 14, 2023
 - This project allows individuals who pass ex parte to be approved as of September 2023 renewals and ongoing
 - Renewals will continue to be generated at a household level, but individuals who are eligible at ex parte will be approved during the final review if a renewal packet or signature is not received
- CBMS Project “Reinstatement for Medical Assistance Project CPPM-8756” will begin the week of October 30th
 - This project will reinstate coverage retroactively for members with renewals in May, June, July, and August 2023
 - Individuals that were identified as eligible at ex parte will be reinstated
 - One-time NEW correspondence sent to reinstated individuals
 - Reinstatement for all identified individuals will be systematically completed by 11/3/2023

What You Need to Know:

1. CBMS will identify members at the individual level who were terminated at ex parte but should have been approved
2. **ALL** individuals that were eligible (met all eligibility criteria and do not have any outstanding verifications) at ex parte will be retroactively reinstated
3. CBMS will identify gap months and reinstate individuals’ coverage during those month(s)
4. Individual(s) will be reinstated retrospectively
5. Some individuals will remain eligible prospectively for a program they were approved for at ex parte (October 2023 forward)



6. Some individuals may be reinstated to a program that they passed for during ex parte, but then transitioned to another program. This may occur due to members reapplying and the highest applicable coverage being provided
7. Some individuals may NO longer be eligible prospectively (October 2023 forward) if they re-apply or report a change in circumstances. 10-day noticing will apply
8. No manual intervention required for eligibility technician(s) to update a case in order for an individual to be reinstated.
9. One-time system update for identified individuals, not an ongoing process
10. Reinstatement criteria is connected to the individual ex parte results
11. Reinstatement is applicable to all medical assistance categories
12. An auto-populated case comment will be created for cases with individuals that were reinstated. *“Individual reinstated due to ex parte in accordance with federal compliance”*

****Key takeaway: the program an individual was passing for at ex parte is the program that will be reinstated with this system update.***

- HCPF will identify cases that have exceptions:
 - Manual intervention not required unless notified by HCPF
 - Eligibility sites will receive communication for any exceptions (such as supervisor authorization or demographic data entry exceptions)
- Identified individuals will receive correspondence:
 - Correspondence will tell member(s) why we reinstated them
 - Identify who in the household was reopened
 - Will provide plain language directions for how to get medical bills paid during this time
 - Will be sent in the same envelope along with appropriate approval notices (and termination if applicable) that include their date(s) of coverage

Example Case Scenario:

Scenario 1: May renewal (Ex parte ran in March)

Household Composition (parent 1, parent 2, child 1, child 2)

Ex parte results:

- Parent 1 failed ex parte MAGI Adult
- Parent 2 failed ex parte MAGI Adult
- Child 1 passed CHP+
- Child 2 passed CHP+
- All household members failed for a new cert period beginning in June given not all individuals passed at ex parte. Failure reason was failing to complete the renewal process and/or provide signature for renewal.



Re-apply date results: Did not re-apply

Reinstatement results:

- CBMS will go back and review individual ex parte results
 - Parent 1 will continue to fail MAGI Adult
 - Parent 2 will continue to fail MAGI Adult
 - Child 1 will be reinstated beginning in June for CHP+
 - Child 2 will be reinstated beginning in June for CHP+
- Household will receive a reinstatement speed letter communicating CHP+ approval for children along with an approval NOA



Example Case Scenario:

Scenario 2: May renewal (Ex parte ran in March)

Household Composition (parent 1, parent 2, child 1, child 2)

Ex parte results:

- Parent 1 passed MAGI pregnant
- Parent 2 failed MAGI Adult
- Child 1 passed CHP+
- Child 2 passed CHP+
- Parent 1 on MAGI pregnant continues to pass due to being on a guaranteed program. All other household members fail beginning in June for failure to complete the renewal process.

Re-apply date results on 09/01/2023:

- Parent 1 passing MAGI Pregnant (guaranteed program)
- Parent 2 failing MAGI Adult
- Child 1 passing MAGI Children (higher benefit category)
- Child 2 passing MAGI Children (higher benefit category)

Reinstatement results:

- CBMS will go back and review individual ex parte results
 - Parent 1 will continue to pass MAGI Pregnant
 - Parent 2 will continue to fail MAGI Adult
 - Child 1 will be reinstated June, July, and August for CHP+
 - Child 2 will be reinstated June, July, and August for CHP+
- Households will receive a reinstatement speed letter communicating CHP+ approval for children, and gap coverage NOA.

For more information or questions contact
hcpf_medicaid.eligibility@state.co.us

