

Covid-19 Public Health Emergency Unwind

Colorado is resuming regular eligibility reviews for people with Health First Colorado (Colorado's Medicaid program) and Child Health Plan *Plus* (CHP+) after a 2+ year pause during the COVID-19 public health emergency (PHE).

Temporary extension for all members up for renewal in September/Early October

The Department of Health Care Policy and Financing (HCPF) received [new guidance from the Centers for Medicare and Medicaid Services \(CMS\)](#) on August 30, 2023, that requires a change to the ex parte process for renewals.

Instead of renewing members through ex parte (automation) at the household level (all members of a household receiving Health First Colorado or CHP+ benefits reviewed for eligibility at the same time), as has been done in the past, CMS is now requiring states to perform ex parte automation reviews on an individual basis, meaning each person in the household is reviewed and approved separately.

Today, the system moves households where everyone in the family can't be approved through an automated ex parte process into the renewal eligibility completion and submission process. This new CMS guidance will require significant changes to our eligibility system that will need to be completed in a phased approach.

As a result, HCPF is implementing a temporary renewal extension for all members up for renewal in September and October until we implement a short-term system change in mid October to bring us into compliance with the new CMS ex parte guidance.

HCPF is also developing a strategy to renew coverage for members who were disenrolled if a household did not properly complete and submit the required renewal application. HCPF will communicate the strategy once it is final. Members eligible to have their coverage renewed will be notified.

Ongoing 60-day renewal extension for vulnerable populations

HCPF is leveraging additional [flexibility from CMS](#) to provide a 60-calendar-day extension to complete the renewal process for our vulnerable populations, including long-term care (LTC), members on waived services, and buy-in recipients who have not returned their renewal packet on time during COVID unwind.

This extension also allows HCPF to do additional outreach to these vulnerable members when they are up for renewal, while providing extra time for the members to return the information and the counties to process it.

The extension is in effect September 5 through the remainder of the unwind period, June 2024. It does not affect members who have already submitted their renewal packet to the county or those who have completed the renewal process.

If a member has already turned in their renewal packet and still needs to submit additional information, the county may grant additional time through a Good Faith Extension for a member to turn in this information.

Frequently Asked Questions

Can members with long-term care (LTC) have more time to complete the renewal process?

Yes, HCPF is leveraging [guidance from CMS](#) to extend the renewal period for people with LTC, waived services and disabled buy-in members who have not returned their renewal packet or members who returned their renewal packet but its review has not been started by an eligibility site.

Instead of the 30-day delay CMS recommended, Colorado will be extending the renewal time frame for LTC members by 60 calendar days to allow for additional outreach and action on the renewal. This allows LTC members to have an additional 60 calendar days to return their packet or for it to be processed by the county for cases that are past due.

Do LTC members still need to complete, sign and return their renewal packets if a special extension is issued?

Yes, all members must complete, sign, and return their renewal packet to continue coverage, and they are encouraged to do so right away when it is their time to renew.

Special extensions allow extra time for more complex renewals; however, members may still risk losing coverage if renewals are not completed during the extended timeframe. Members must take action to maintain their coverage by submitting all the required information and documents.

How is Colorado responding to [new guidance from the Centers for Medicare and Medicaid Services \(CMS\)](#) for the ex parte process?

All states received guidance from CMS on August 30, 2023, that requires a change to the ex parte (automation) process for renewals.

Instead of renewing members with ex parte at the household level (all members of a household receiving Health First Colorado or CHP+ benefits reviewed for eligibility at the same time), as has been done in the past, CMS is requiring states to perform ex parte automation reviews on an individual basis, meaning each person in the household is reviewed and approved separately.

While this will increase automation and efficiencies over the long term, this new guidance will require significant changes to our eligibility system that will need to be completed through a phased approach. As a result, HCPF is implementing a temporary renewal extension for all members up for renewal in September and October until we implement a short-term system change in mid October to bring us into compliance with CMS guidance. The extension and short-term system change will not impact the member's experience of the renewal process. Members are strongly encouraged to complete, sign, and return their renewal packet right away.

If a member with a September 2023 renewal date misses the deadline, will they lose coverage on September 30?

Members with a September renewal have until mid-October to return their packet without losing coverage while we implement a short-term fix for the ex parte process. If a member is determined to no longer be eligible for coverage during their renewal cycle, their coverage may end at the end of October. Members are strongly encouraged to complete, sign and return their renewal packet right away, not wait until the last minute.

What is the Good Faith Extension?

The Good Faith Extension is an agreement between the HCPF and counties to support all members going through the renewal process who indicate they are attempting to gather requested verifications and experiencing challenges and/or need additional time to gather documentation. County eligibility workers can use this extension to support members in taking additional time to submit the verifications and avoid an unnecessary termination.

Can a member return their renewal packet late?

Members can resume medical coverage if they still qualify by returning their renewal packet and any missing information to their county for processing within 90 days of losing coverage. In PEAK, an item was added to the To-Do List to indicate when a late medical assistance renewal can be submitted and processed without needing a new application. Members are encouraged to return renewal packets within 90 days if they miss the deadline rather than submitting new applications.

Can a member's eligibility be backdated if they are disenrolled?

If a member is disenrolled for a procedural reason, they have a 90-day reconsideration period to submit their renewal packet. If they are determined to still be eligible during that 90-day period, coverage begins as of the 1st of the month they are determined eligible again.

If there is a gap in coverage, members must ask the county to be enrolled retroactively. If a member is determined no longer eligible, and they disagree with the decision, they can file an appeal.

How can you help support members during the PHE unwind?

HCPF has developed extensive partner toolkits regarding the end of the continuous coverage requirement. [Update Your Address, Understanding the Renewal Process](#) and [Take Action on Your Renewal](#) toolkits all include resources to help members take action to keep their coverage. A new joint webpage [KeepCOCovered.com](#) includes partner resources and information for those who may need to transition to other health coverage. [Flyers have recently been developed for Colorado employers](#) to distribute to their employees to help spread the word.

You can help raise member awareness about the renewal process by sharing the messaging in our toolkits.

The materials in the toolkits identify key actions for members to take: updating contact information, taking action when a renewal is due, and seeking help with renewals at community or county resources when they need it. Flyers, social media messaging and graphics, website content, and other outreach tools can be found in our [PHE Planning Resource Center](#). Partners can also educate themselves and their staff on the basics of the renewal process to assist members who may need help. See our [Renewal Education toolkit](#).

Members with questions about the renewal process can learn more by visiting Health First Colorado's renewal webpage available in [English](#) and [Spanish](#).

A special thank you for your partnership and continued collaboration!

More [Frequently Asked Questions \(FAQs\)](#) about the end of the continuous coverage requirement and return to regular renewal processes have recently been added and are available in the PHE Planning Resource Center.

Partner webinars

HCPF will be hosting quarterly informational sessions about the end of the Continuous Coverage Requirement and the COVID-19 Public Health Emergency. These webinars are geared toward community partners such as advocacy organizations, providers, and community organizations who may provide other assistance to Health First Colorado or CHP+ members (housing, social services, etc.).

The presentation and recording from the July 26, 2023, PHE Unwinding webinar are posted in the [PHE Resource Center](#).

Next Webinar Information

When: Oct. 25, 2023, 1 - 2:30 p.m. Mountain Time

[Register in advance for this webinar.](#)

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