



## SUMMARY OF HCPF OPERATIONAL MEMOS IN RESPONSE TO COVID-19 ADULT DAY SERVICES CENTERS

*In an effort to make access easier for members to important COVID-19 information and policy changes, LeadingAge Colorado has put together this document listing all operational memos issued by HCPF. The memos are organized by provider with the latest at the top.*

### [HCPF HCBS Webinar](#)

### UPDATES RELEVANT TO ADS

**Effective Date: 4/17/2020**

**Summary:** In the Questions section of the webinar, a case manager said that an ADS center asked to receive retainer payments for a client that was service planned, after the ADS center closed, to start ADS after the COVID-19 emergency. Bonnie Silva said this is not allowed – that retainer payments must be budget neutral. Following is a summary of the webinar:

### **HCPF Executive Director Kim Bimestefer Update:**

- They are re-examining new member messaging, as they are expecting a surge in applications, mainly from individuals who had employer-sponsored insurance. HCPF is working to increase service capacity to enroll and assist new members. So far they are able to keep up with the demand.
- Medicaid enrollments have increased significantly but she doesn't believe it will have huge budget impact because utilization, including elective surgeries, dental appointments, and routine medical appointments, has decreased.
- HCPF is working with partners including the State EOC, FEMA and CDPHE to secure PPE and assist with alternative care sites. HCPF has 8 staff working 20-25 hours per week to source PPE for providers and members regardless of the setting.
- Colorado has been working with other states regarding influencing the 4<sup>th</sup> stimulus package. A joint letter will be going to the federal administration from the governors around the country. They are lobbying for an increased federal match and would appreciate provider support in lobbying for this as well.
- HCPF is modeling to forecast membership, staffing, impact to budget, utilization to help plan for future shortfalls after the COVID-19 pandemic ends.
- Looking at managing an anticipated \$3.2 billion revenue shortfall next fiscal year.
- In the process of operationalizing additional approved changes from the federal government.
- The creation of the COVID-19 Action Team this week. This was put in place at HCPF and CDPHE urging with support from the Governor's office, due to the growing number of outbreaks in healthcare facilities. Bonnie Silva from HCPF and Randy Kuykendall from CDPHE are the co-leads of this team, which includes individuals with expertise. The initial focus of the team is on the following items:
  - Securing additional funding
  - Ensuring PPE to greatest needs
  - Ensure compliance with HCPF operational memos, **public health orders**, CDPHE, CMS and CDC guidance re: infection control, visitor restrictions, health screening, etc.
  - Education

- Testing
- Staffing capacity
- Provider capacity

**Greg Schlosser, CDPHE, updates:**

- No change to the process for securing PPE.
- No change to status of operation of State EOC.
- The first alternative care site is expected to be operational by the end of April or early May.
- No change to survey priorities.
- CDPHE is operationalizing a dispatch call center to coordinate the transport of patients to alternative care sites or inter-facility transfers. This will be coordinated with EMS. It is to be operational on Monday, 4/20.
- Residential and nursing facility outbreak information will be released every Wednesday. An outbreak is two or more cases within a 14 day period. There is a link to the data on slide #6. Host home information will not be made public due to privacy issues.
- Slide #6 contains a link to HFEMSD blog that contains updated COVID-19 related memos.

**Marivel Klueckman, HCPF Eligibility:**

There is continuous enrollment of any person on Medicaid as of 3/18/2020 until the federal emergency declaration ends. There are only three exceptions: death, not a Colorado resident, or individual voluntarily terminates. System changes were implemented on 4/5 to make sure no one loses their benefits, i.e. to “lock-in” members. There were process in place to reopen all cases with end dates of 3/31 and 4/30, to be sure the clients remain enrolled. They will remain eligible even if found ineligible for reasons such as over assets. Eligibility techs will continue to process renewals and changes.

Clients impacted by the CBMS/interChange mismatch are also considered part of the continuous enrollment group. These are clients who were correctly disenrolled in CBMS, but not in interChange payment system. They were scheduled to be terminated in interChange 3/31/20, but now will remain eligible for provider payment until the federal emergency declaration has ended.

Premiums have been waived for working clients on the Medicaid buy-in program and working requirements have been waived during pandemic.

HCPF is still seeking approval from CMS on self-attestation for some eligibility documents.

Klueckman reviewed progress made in processing applications, as shown in slides 15 - 17. There was a backlog due to changes to CBMS as part of the transformation system upgrade in 2019. Eligibility techs had delays due to training and learning the new system; also there were system “challenges”, primarily in October thru December. January thru March techs focused on backlogs. In January there was decreased timeliness for applications, as redeterminations were given priority. There was a time lag in March due to the number of new applications, but they are now meeting standards for processing. She provided the following data on processing times for medical assistance applications:

- 34% approved within 1 day (real time eligibility via PEAK)
- 46% approved within 5 days
- 79% approved within 30 days

This data does not break out LTSS, which has a 90-day requirement – she will provide that information soon.

Klueckman also mentioned the new COVID Uninsured benefit to cover COVID testing only.

**Bonnie Silva, HCPF:**

HCPF received approval from CMS on the following Appendix K requests:

- Modifying staffing ratios and training requirements
- Waiving PMIP requirement for initial and annual assessments
- Retainer payments for residential providers
- Sick leave payments for CDASS attendants

Operational memos should come out next week re: PMIP and sick leave for CDASS attendants. For modifying staffing ratios, training requirements and retainer payments for residential providers, they will be determining whether necessary and how to implement.

No new operational memos came out this week, but they have updated the FAQs. There is a link to the FAQs on slide #20.

Operational memos coming out next week:

- Sick leave for CDASS attendants
- Notice of Action changes in response to COVID to keep eligibility
- CM operational changes for temp waiving of PMIP
- Updated changes to benefits and services due to COVID-19
- Clarification to temp changes to PASRR
- Reporting requirements for positive and presumptive positive COVID-19 cases to local health dept for critical incidents

In the 4/17 Nursing Facility webinar, Silva mentioned a just-received DORA guidance re nursing students, which is available at: <https://content.govdelivery.com/accounts/CODORA/bulletins/286e1c8>. It appears that this may provide more flexibility in staffing with not fully trained and certified nurses and CNAs.

Silva mentioned that the COVID-19 certification training is available; however, to register for free you had to register 4/17/20. If signed up by 4/17, providers can take the course through the week of 4/20. Starting the week of 4/20, there will be a reduced fee to take the course.

Silva asked providers to complete the workforce shortage survey, which is needed by 4/20/20. It is gathering information about staffing in hopes of identifying gaps and where HCPF can help.

**NEXT STEPS**

- To work on how to implement increased funding for nursing homes and ALRs
- Several new operational memos
- Thank you to LeadingAge Colorado and other provider organizations for working with us, submitting questions, making us aware of issues

In the Question section: Is virtual QMAP certification possible? Yes, this is possible, but the training entity must contact CDPHE, update their training materials, and get it approved.

**Note: Not all of the above information is included in the webinar slides.**

**HCPF OM 20-039      UPDATED CASE MANAGEMENT OPERATIONAL CHANGES IN RESPONSE TO COVID-19**

**Effective Date: 3/13/2020**

**Summary:** Issued 4/10/20. Supersedes HCPF IM 20-017 & HCPF OM 20-021. Extends retainer payments to employment services offered through the Waiver for Persons with Developmental Disabilities (DD) and the Supported Living Services (SLS) Waivers: Prevocational Services and Supported Employment. Also provides guidance to providers on adjusting claims submitted to date for retainer payments, as well as instructions on how to bill services going forward. These actions must be taken in order to receive retainer payments.

**HCPF OM 20-034      UPDATED CASE MANAGEMENT OPERATIONAL CHANGES IN RESPONSE TO COVID-19**

**Effective Date: 3/11/2020**

**Summary:** Supersedes OM 20-018. Effective date 3/11/20. Authorizes case managers to use electronic video for any contact or assessment for programs including nursing facilities, alternate care facilities and adult day services. Phone can be used if the member does not have access to electronic video. Initial and continued stay reviews are authorized for up to a year.

**Note:** During the HCPF HCBS webinars on 3/27/2020 and 4/03/2020 it was reported that individuals enrolled in Medicaid as of 3/18/2020 will continue on Medicaid until the pandemic ends unless the individual requests to dis-enroll or moves out of state.

**HCPF HCBS WEBINAR      Effective Date: 4/03/2020**

**Summary:** The \$1200 stimulus payment does not impact financial eligibility. Implementation of final settings rule cannot be delayed, as this is in federal law. Non-residential providers will be notified once the PTP platform is available. There is flexibility re required verification documents for eligibility. Until bank statements are received, an attestation can be submitted. HCPF is in conversations with CMS re how long retainer payments will be allowed. During the pandemic, a client does not need to receive at least one service every 30 days to keep eligibility. Re whether there can be hazard pay during pandemic: HCPF is working with CMS and legislature to understand how to best prioritize and support all providers.

**Note:** There is no link to this information, as this was part of the Q&A, not in the slides.

**HCPF OM 20-031      NON-MEDICAL TRANSPORTATION      Effective Date: 4/01/2020**

**Summary:** Limits non-medical transportation (NMT) to essential services and needs only, i.e. grocery, pharmacy, and bank. Members using NMT may not have any symptoms of illness. Limits one member per vehicle. Instructs NMT providers on proper hygienic and sanitization processes. Instructs members to use Non-Emergent Medical Transportation (NEMT) for essential medical appointments.

**HCPF NON-RESIDENTIAL HCBS WEBINAR      VARIOUS TOPICS      Effective Date: 3/18/2020**

**Summary:** Restricts all visitors, with a few exceptions such as end-of-life. Residents retain the right to contact the ombudsman, who should be admitted. Those with symptoms of a respiratory infection should not be allowed in the facility, even if end-of-life. An exception is a surveyor, if the surveyor has no fever. Another exception is a healthcare worker – follow CDC guidelines. Cancel communal dining and all group activities. CMS QSO-10-14-NH is the source.

**HCPF OM 20-022      COVID-19 CIR REPORTING BY CM      Effective Date: 3/19/2020**

**Summary:** Instructs case managers that BUS has been updated to facilitate accurate reporting of members with presumptive or confirmed positive case of COVID-19. Instructs case managers to report

cases to CDPHE, review client services and make changes to meet needs during illness and limit exposure to others.

Note: In the HCPF webinar on 3/27/2020 Greg Schlosser from HFEMSD/CDPHE informed providers that they no longer need to notify CDPHE of positive COVID-19 cases. This information is reported to CDPHE directly from the labs.

**[HCPF OM 20-017](#)      DEPARTMENTAL GUIDANCE ON LONG-TERM CARE AND CONGREGATE SETTINGS**

**Effective Date: 3/13/2020**

**Summary:** Encourages providers to take emergency measures to screen members and consider restricting visitors at settings, including ADS Centers. Note: stronger restrictions have been released since OM 20-017.

**[IM 20-017](#)      COVID-19 COMMUNICATION FOR ADULT DAY, DAY HABILITATION AND BRAIN INJURY DAY TREATMENT PROVIDERS**

**Effective Date: 3/13/2020**

**Summary:** Authorizes use of technology or alternate settings to provide adult day services, due to COVID-19. Any change in services delivery must be agreed to by client and documented. Day program providers that have stopped or reduced services due to COVID-19 may bill for retainer payments, only if the client chooses not to receive such services elsewhere. Retainer payments can only be billed when authorized and documented in the client's service plan.