

## **Written Protocol to Strengthen Relationships and Improve Coordination Among Colorado Beneficiary Rights and Protections Programs through an Alliance**

### **Intent**

The protocol establishes an alliance among the organizations that will provide Beneficiary Rights and Protections services to full benefit Medicare-Medicaid enrollees who participate in Colorado's Demonstration to Integrate Care for Medicare-Medicaid Enrollees (the Demonstration). These organizations will build a structure for communication and interaction involving the Department of Health Care Policy and Financing (the Department) and the Centers for Medicare & Medicaid Services (CMS). The Department's Demonstration proposal has been submitted to CMS and is based on Colorado's existing managed fee-for-service environment in which there is no single, statewide Ombudsman. Supplemental funding opportunities to be pursued by the Department in accordance with CMS-sponsored Financial Alignment Models for Medicare-Medicaid Enrollees include State Health Insurance Assistance Program (SHIP) and Aging and Disability Resource Center (ADRC) Options Counseling and Support for Demonstration Ombudsman Programs.

To best serve the Demonstration's enrollees, this protocol is designed to be collaborative and to draw upon the expertise of each participant, each of which will continue to maintain its individual mission, statutory role, and regulatory responsibilities. The protocol aims to draw upon systems and information currently available, reflecting a commitment to administrative simplification and continuous improvement.

### **Purpose**

The purpose of the protocol is to promote collaboration among Beneficiary Rights and Protections service organizations and between the alliance of these organizations and each applicable managing agency within the state to better serve their shared clients. This protocol fosters the common aims of (1) assistance to and advocacy on behalf of Medicare-Medicaid enrollees who have grievances or complaints, (2) seamless access to the various services provided by members of the Beneficiary Rights and Protections alliance, (3) education and information about enrollee rights, (4) recommending options for change in the provision of Beneficiary Rights and Protections services, and the overarching aim of (5) support for the Demonstration in providing integrated services to enrollees: care coordination, benefits and eligibility coordination, and quality of service accountabilities are recognized as important in improving outcomes.

## Process

Establish a work group among Colorado organizations providing Beneficiary Rights and Protections services to:

- Discuss individual roles and responsibilities, common and differing services, and ways to work together to effectively serve Medicare-Medicaid enrollees in the Demonstration.
- Prepare a preliminary draft of a protocol to establish an alliance among the organizations; share the draft with the Regional Care Collaborative Organizations (RCCOs) whose staff will ensure the coordination of care for Demonstration enrollees; and adjust the draft as necessary with input from the RCCOs and discussion among the alliance members.
- Submit the draft protocol as a recommendation to the Demonstration's Advisory Subcommittee and the Department.
- Revise the draft protocol as appropriate, issue in final form, and obtain the signatures of the participating organizations to implement the protocol.

## Elements

### Regular Meetings

The participating organizations in the alliance will meet regularly, no less frequently than quarterly for the duration of the Demonstration, to:

- Receive information from the Department and the RCCOs on the progress of the Demonstration and in the progress toward the implementation of related State Health Insurance Assistance Program (SHIP) and Aging and Disability Resource Center (ADRC) Options Counseling and Support for Demonstration Ombudsman Programs.
- Develop a set of definitions for services provided under the classification of Beneficiary Rights and Protections.
- Share information and data on the Beneficiary Rights and Protections services provided by each organization.
- Raise, discuss, and provide advice and recommendations to the alliance members and to the Department on problems and issues.

The alliance will determine agendas and required or requested attendees. Representation from the CMS Regional Office and Medicare-Medicaid beneficiaries of the Demonstration's Advisory Subcommittee will be permanent invitees.

### Access to Department Resources

The Department will provide ongoing assistance and support for problem resolution between regular meetings of the alliance. The Department will work with alliance members to address issues such as Medicaid eligibility, benefits, or other topics related to the Demonstration that affect Beneficiary Rights and Protections for Medicare-Medicaid enrollees in the Demonstration.

### Information Sharing

The participating organizations in the alliance will develop methods to share existing information, protected from any improper disclosure by all applicable privacy and confidentiality rules and regulations. Such information will provide a statewide and Demonstration-wide view of Beneficiary Rights and Protections services. Such information will be provided to the Department for analysis and feedback to the alliance members. Alliance members will bring information and de-identified case experiences to their regular meetings with the Department, RCCOs, and CMS so that patterns and trends of beneficiary difficulties can be identified. No official data sharing by the organizations is expected; however, sharing aggregate information to provide case patterns and examples is encouraged. Methods and procedures for sharing information will be developed by the members of the alliance with consultation from the Department. Alliance members will review common Beneficiary Rights and Protections data within the Demonstration and the State Health Insurance Assistance Program (SHIP) and Aging and Disability Resource Center (ADRC) Options Counseling and Support for Demonstration Ombudsman Programs.

### Recommend Process Improvements

Alliance members will bring process problems as well as best practices to the regular meetings. The purpose of discussions to address problems and successes is to identify training needs, improvements in educational materials, and improvements in processes to ensure participants in the Demonstration are seamlessly served when they seek assistance with a Beneficiary Right or Protection issue. Through their joint deliberations, alliance members will provide recommendations to the Department for development, implementation, or issuance of training or informational materials and/or process improvements to better serve Demonstration enrollees. The Alliance will provide recommendations for coordination, communication and dissemination of Beneficiary Rights and Protections program information from all related CMS funding sources.

## **Membership**

The current members of the alliance include:

- The Department
- The Seven Regional Care Collaborative Organizations
- The Long-term Care Ombudsman

- The Medicaid Managed Care Ombudsman
- The State Health Insurance Assistance Program
- Colorado Center on Law and Policy
- Colorado Cross-Disability Coalition

Permanently invited guests include:

- The Medicare Quality Improvement Organization
- Colorado Legal Services
- The CMS Regional Office
- Medicare-Medicaid beneficiaries of the Demonstration's Advisory Subcommittee

Attached to this protocol is a matrix of service categories provided by members of the alliance who provide Beneficiary Rights and Protections services to Medicaid and/or Medicare beneficiaries in Colorado.

**Review**

Protocols will be reviewed no less frequently than quarterly. Any changes will be recommended to the Demonstration's Advisory Subcommittee and the Department (January 2014 and thereafter).

**Matrix of Beneficiary Rights and Protections Services by Organization**

		LTC	MMCO	QIO	SHIP	CCLP
<b>Enrollees</b>						
Medicare		X		X	X	
Medicaid		X	X		X	X
<b>Complaints/Grievances</b>						
Medicare		X		X	X	
Medicaid		X	X			
<b>Individual Advocacy/Appeals</b>						
Medicare					X	
Medicaid			X			
<b>Refer Law/Reg Enforcement</b>						
Medicare		X	X *		X *	
Medicaid		X	X *		X *	
<b>System Advocacy</b>						
Medicare		X		X	X	
Medicaid		X	X			X
<b>Education and Information</b>						
Medicare		X		X	X	
Medicaid		X	X			
<b>Enrollment Assistance</b>						
Medicare					X	
Medicaid						
<b>Legal Rep</b>						
Medicare						
Medicaid						

\*When appropriate, will refer for legal assistance or to DORA