



COLORADO

Department of Health Care
Policy & Financing

Medical Services Board Update: Simultaneous Enrollment

October 9, 2015

Simultaneous enrollment occurs when an individual is enrolled in Medicaid or Child Health Plan *Plus* (CHP+) and a private plan through Connect for Health Colorado while receiving financial assistance (Advanced Premium Tax Credit and/or a Cost-Sharing Reduction).

Background

The occurrence of simultaneous enrollment was first identified in January 2014. Initially there were individuals enrolled simultaneously due to the bifurcation of systems for determining eligibility. Further research established that although the eligibility systems were combined into one shared eligibility system in late 2014, the established policies and processes between the Department and Connect for Health Colorado will continue to create simultaneous enrollment. This occurs through the following:

- Retroactive eligibility determination of Medicaid or CHP+
- Redetermination of eligibility through an appeal
- Timing in reporting and redetermining eligibility due to change in circumstances
- Quality assurance of application resulting in a redetermination of eligibility (either by individual or eligibility worker)

The Department has partnered with Connect for Health Colorado as well as the Division of Insurance to attempt to find a reasonable solution for individuals, providers, and carriers. There have been multiple stakeholder meetings and updates provided over the course of the last two years.

Challenges

Colorado has been one of the first states to identify this situations; as such, there has been very limited guidance from our federal partners at Centers for Medicare and

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Medicaid Services. It is just recently within the last couple months that this is surfacing within other states. In the meantime, there are challenges encountered for individuals as well as providers and carriers. These include:

- The individual has a potential tax liability for receiving tax credits when eligible for Medicaid; paying full price private insurance premiums; when a no cost coverage is available; lack of continuity of care between provider panels;
- The carriers may pay claims for a customer who should be covered under Medicaid.
- The providers may render care while patient is covered by an alternative coverage; may need to accept a different reimbursement amount or forego reimbursement

Current Status

As of today, the Department and Connect for Health Colorado have collaborated to create a monthly automated report to identify individuals simultaneously enrolled. This report is worked by Connect for Health Colorado who reach out to each impacted customer, educate the individuals on their options, and take action on the simultaneous enrollments prior to that month's end.

As of early September 2015, there have been 3,749 cases worked YTD with approximately 200 outstanding cases to be worked.

The Department and Connect for Health Colorado continue to review and analyze the data and system updates to ensure timeliness and accuracy in the identification of simultaneously enrolled individuals. We continue striving to obtain a resolution that provides protections for our clients, carriers and is approved by our federal partners.

