

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-25-26
Baltimore, Maryland 21244-1850



State Demonstrations Group

May 6, 2025

Adela Flores-Brennan
Medicaid Director
Colorado Department of Health Care Policy and Financing
303 E. 17th Avenue
Suite 1100
Denver, CO 80203

Dear Director Flores-Brennan:

The Centers for Medicare & Medicaid Services (CMS) approved Colorado's Evaluation Design for the Reasonable Opportunity Period COVID-19 Public Health Emergency (PHE) amendment to the 1115 demonstration entitled, "Colorado Expanding the Substance Use Disorder Continuum of Care" (Project No: 11-W-00336/8 and 21-W-00079/8). We sincerely appreciate the state's commitment to efficiently meeting the requirement for an Evaluation Design as was stipulated in the approval letter for this amendment dated June 23, 2023.

In accordance with 42 CFR 431.424(c), the approved Evaluation Design may now be posted to the state's Medicaid website within 30 days. CMS will also post the approved Evaluation Design on Medicaid.gov.

Consistent with the approved Evaluation Design, the draft Final Report will be due to CMS 18 months after the expiration of the amendment approval period.

We sincerely appreciate the state's commitment to evaluating the Reasonable Opportunity Period COVID-19 PHE amendment under these extraordinary circumstances. We look forward to our continued partnership on the Colorado Expanding the Substance Use Disorder Continuum of Care section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,

Danielle Daly
Director
Division of Demonstration Monitoring and Evaluation

cc: Ronna Bach, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

Colorado's Reasonable Opportunity Period Extension
COVID-19 Public Health Emergency
Medicaid Section 1115 Demonstration Draft
Evaluation Design
12/10/24 (rev.)

Section 1. Introduction and Background

The Centers for Medicare & Medicaid Services (CMS) developed a new section 1115(a)(2) demonstration opportunity to allow states to extend the Reasonable Opportunity Period (ROP) during the transition out of the COVID-19 Public Health Emergency (PHE) and during the unwinding period for members who declared to U.S. citizenship at the time of Medicaid application. Extending the ROP for these members through the section 1115 demonstration opportunity is expected to support parity in the application of the verification policies and processes between these members and members who declared to satisfactory immigration status, the latter provided for at 42 C.F.R. § 435.956(b)(2)(ii)(B) and implemented under the Medicaid state plan. Thus, the demonstration opportunity is likely to facilitate continuity of coverage during the PHE unwinding period.

The ROP extension demonstration amendment assists Colorado in processing eligibility and enrollment actions during the unwinding period by providing additional time to complete outstanding verifications to prevent inappropriate terminations of coverage, which may not be possible for those whose declared U.S. citizenship status has not been verified or whose status is inconsistent with available data sources absent this demonstration. Furthermore, this demonstration amendment supports parity with existing policy that allows states to, through a state plan amendment, implement a good faith extension of the ROP for members who have attested to a satisfactory immigration status. This extension allows the state to maintain coverage for an individual declaring to be a U.S. citizen if the state has not been able to verify the individual's status through available electronic data sources, if the state determines that the individual is making a good faith effort to obtain any necessary documentation, or to assist the individual in obtaining documents needed to verify their status.

The Department of Health Care Policy & Finance (HCPF) has implemented the strategy to send a verification checklist to those members impacted by 1115(a)(2) demonstration and allow them an opportunity to provide verification of their citizenship status prior to terminating benefits for failure to provide verification.

Section 2. Evaluation Overview

HCPF proposes an evaluation design consistent with evaluation design recommendations and requirements outlined in the "COVID-19 PHE Medicaid Section 1115 Demonstration: Guidance for Monitoring and Evaluation Final Report" document.

The evaluation will test if the application of waiver 1115(a)(2) which allows members an additional opportunity to provide verification of their citizenship status will increase member renewal compared to terminating for failing to provide verification during the PHE.

The following research questions and associated hypotheses will assist in the evaluation of the main objectives and goals of this ROP demonstration.

Hypothesis 1: HCPF anticipates that the extension of the ROP will allow HCPF to provide verification requests to members who attested to their citizenship but their citizenship has not been verified.

Description: Extending the ROP for members will result in the completion of outstanding verifications for those whose declared citizenship status has not been verified. We will evaluate which members require additional verification and send them a Verification Check List (VCL) requesting that they provide verification of their citizenship.

Research Question: Were members notified by VCL that verification of their citizenship was required?

Hypothesis 2: HCPF anticipates that members who attested to their citizenship will maintain coverage during the ROP extension.

Description: Members in the citizenship verification process during the ROP demonstration will have continuity of coverage and not have their coverage terminated due to a procedural reason related to their citizenship. HCPF will evaluate whether members were able to maintain coverage during the verification process.

Research Question: Were members maintained in their current aid code until their citizenship was verified, eligibility was determined, or the ROP demonstration was completed?

Hypothesis 3: HCPF anticipates that members who attested to their citizenship that are not able to provide verification will receive an appropriate eligibility determination.

Description: Members for whom their citizenship cannot be verified during the ROP, will receive an eligibility determination appropriate to their circumstances. We will evaluate if members whose citizenship could not be verified received an eligibility determination.

Research Question: Did members who were sent a VCL through the ROP demonstration get an appropriate eligibility determination if they were not able to provide verification?

Hypothesis 4: HCPF anticipates that the extension of the ROP will lead to a completion of outstanding citizenship status verification.

Description: Extending the ROP for members will result in completion of outstanding verifications for those whose declared citizenship status has not been verified. HCPF will evaluate whether members' citizenship statuses were able to be verified.

Research Question: Were members able to have their citizenship status verified?

Hypothesis 5: HCPF anticipates that any administrative challenges associated with implementing the ROP will be addressed and result in improvements beneficial to future actions.

Description: This ROP Demonstration will reduce administrative challenges associated with processing eligibility and enrollment actions related to the U.S. citizenship verification process during the unwinding period. HCPF will use the ROP demonstration as an opportunity to assess the state's ability to implement projects of this type. HCPF will evaluate the successes and challenges and any improvements that may need to be incorporated into future projects.

Research Questions: What were the principal challenges from the perspective of the state Medicaid agency? What actions did HCPF take to address challenges presented by the implementation of the ROP demonstration and to what extent were they successful?

Section 3. Methodology, Data Sources and Limitations 3.1. Evaluation Design Summary

HCPF will use an evaluation design based on reviewing data outcomes that demonstrate approved and denied members that were requested for verification of citizenship status, over time and by county. HCPF will utilize quantitative data from its eligibility and enrollment system, Colorado Benefit Management System (CBMS), to validate or invalidate its hypothesis.

3.2. Measures, Data Sources, and Approach

HCPF will approach this Evaluation design through a mix of qualitative and quantitative analytic approaches, as described in the *Table 1* below.

Table 1

Hypothesis & Evaluation Questions
Hypothesis 1: HCPF anticipates that the extension of the ROP will allow HCPF to provide an additional verification request to members who attested to their citizenship but their citizenship has not been verified.

Research Question	Measures	Data Sources	Analytic Approach
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Question 1: Were members notified by Verification Checklist (VCL) that verification of their citizenship was required?	<ul style="list-style-type: none"> Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: <ul style="list-style-type: none"> Were sent a VCL 	Colorado Benefit Management System (CBMS)	Descriptive
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Hypothesis 2: HCPF anticipates that members who attested to their citizenship will maintain coverage during the ROP extension.

Research Questions	Measures	Data Sources	Analytic Approach
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Question 2: Were members maintained in their current aid code until their citizenship was verified, eligibility was determined, or the ROP demonstration was completed	<ul style="list-style-type: none"> Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: <ul style="list-style-type: none"> Maintained coverage during the ROP 	Colorado Benefit Management System (CBMS)	Descriptive
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Hypothesis 3: HCPF anticipates that members who attested to their citizenship that are not able to provide verification will receive an appropriate eligibility determination.

Research Questions	Measures	Data Sources	Analytic Approach
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Question 3: Did members who were sent a VCL through the ROP demonstration get an appropriate eligibility determination if they were not able to provide verification?	<ul style="list-style-type: none"> Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: <ul style="list-style-type: none"> Were unable to verify their citizenship and had an eligibility determination completed based on this result. 	Colorado Benefit Management System (CBMS)	Descriptive
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Hypothesis 4: HCPF anticipates that the extension of the ROP will lead to a completion of outstanding citizenship status verification.			
Research Questions	Measures	Data Sources	Analytic Approach
Question 4: Were members able to have their citizenship status verified?	<ul style="list-style-type: none"> Number of members who attested to their citizenship status, which could not be verified and were locked 	Colorado Benefit Management System	Descriptive
	into Continuous Coverage who: <ul style="list-style-type: none"> Had their citizenship status verified <ul style="list-style-type: none"> Analysis of the outcomes for the population 	(CBMS) Interview feedback from key eligibility staff	
Hypothesis 5: HCPF anticipates that any administrative challenges associated with implementing the ROP will be addressed and result in improvements beneficial to future actions.			
Research Questions	Measures	Data Sources	Analytic Approach
Question 5: What were the principal challenges from the perspective of the state Medicaid agency? What actions did HCPF take to address challenges presented by the implementation of the ROP demonstration and to what extent were they successful?	<ul style="list-style-type: none"> Description of challenges (if any) related to the implementation of the ROP extension demonstration. Description of actions taken to address challenges. Description of the results of these actions. 	Interview feedback from key eligibility staff	Descriptive

Analytical Approach

Outcomes will be measured for twelve (12) months after approval of the waiver.

HCPF will access data from the Colorado Benefits Management System (CBMS) which is Colorado's statewide database system through which eligibility is determined for medical, food, cash and other assistance programs.

HCPF will interview key eligibility staff. Interviews will include a review of the principal successes, challenges, and responses associated with engagement with members, and the ability to provide access to care during the PHE. The goal is to give context to

quantitative data analysis and identify which flexibilities were most effective in achieving the goals of the demonstration and what challenges remained

Methodological Limitations

This approach has a few limitations that could impact the analysis and evaluation outcomes. The first limitation is that there is no comparison group to demonstrate that this approach was successful. HCPF has not been faced with the environmental conditions to have used this approach previously to compare the outcomes. The second limitation involves restrictions with accessibility of the data. While the goal of the approach is to minimize members from being removed from benefits due to verification of citizenship status, members may have been removed for other reasons, such as voluntarily withdrawing or relocation out of state. With possible outcomes like these, that can decrease the population being sampled along with illustrate that there was a decrease in members covered, which could skew the results.

3.3. Timeline and Major Milestones

Date	Description / Milestone
June 23, 2023	ROP Demonstration Approved by CMS
December 23, 2023	ROP Demonstration Evaluation Design Due I <i>*due 180 days after Demonstration approval</i>
January 4, 2024	ROP Demonstration Evaluation Design Submitted
April 3, 2024	CMS Feedback on ROP Demonstration Evaluation Design
June 4, 2024	Revised ROP Demonstration Evaluation Design Submitted
June 30, 2024	Official end date of ROP Demonstration <i>*due 15 months after beginning of state's unwinding period on April 1, 2023</i>
July 9, 2024	CMS Feedback on ROP Demonstration Evaluation Design
December 10, 2024	Revised ROP Demonstration Evaluation Design Submitted
December 30, 2025	Final Report Due for ROP Demonstration (18 months after after end of ROP Demonstration period on June 30, 2024)