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

October 16, 2026

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

Dear Director Flores-Brennan:

The Centers for Medicare & Medicaid Services (CMS) completed its review of Colorado's Final Report for the Reasonable Opportunity Period COVID-19 Public Health Emergency (PHE) amendment to the section 1115 demonstration entitled, " Colorado Expanding the Substance Use Disorder Continuum of Care" (Project No: 11-W-00336/8 and 21-W-00079/8). This report covers the demonstration period from June 23, 2023 to June 30, 2024. CMS determined that the Final Report, submitted on February 5, 2026 is in alignment with the CMS-approved Evaluation Design, and therefore, approves the state's Final Report.

In accordance with STC #12.11, the approved Final Report may now be posted to the state's Medicaid website within 30 days. CMS will also post the Final Report on Medicaid.gov.

Program Integrity
States are responsible for following all applicable federal law and regulations when they claim and use federal Medicaid and CHIP funds and must fully comply with all applicable Medicaid and CHIP statutes and regulations under a section 1115 demonstration, except where specific provisions have been expressly waived or identified as not applicable for that demonstration. This obligation includes all requirements in Title XIX and Title XXI of the Social Security Act and implementing regulations governing provider screening and enrollment activities, pre- and post-payment review claiming, payment methodologies and rate-setting, utilization controls, and program integrity including processes to identify, investigate, and refer suspected fraud, and methods to receive complaints and identify questionable practices. States must maintain effective systems and safeguards to prevent, detect, and address any fraud, waste, or abuse (FWA) in the delivery of and payment for Medicaid and CHIP services, including referrals to law enforcement when appropriate.

States should have heightened monitoring and oversight mechanisms in place featuring robust internal controls to identify and remediate all vulnerabilities (including, but not limited to, FWA and beneficiary access issues) inherent in service areas approved as part of a demonstration. At any time, CMS may request that the state provide a plan detailing the state's systems and safeguards to prevent, detect, and address any FWA relative to this demonstration. Failure to meet program integrity obligations under federal statutes and regulations or under the terms and conditions of this demonstration approval may result in compliance actions or other enforcement measures that could include requirements to develop and implement corrective action plans, withholdings, deferrals, disallowances, and termination of demonstration authority.

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

Sincerely,

DANIELLE DALY -S

Digitally signed by DANIELLE DALY -S
Date: 2026.10.16 05:49:00 -04'00'

Danielle Daly
Director
Division of Demonstration Monitoring and Evaluation

cc: Keri Rosenbloom, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

Colorado's Reasonable Opportunity Period Extension
COVID-19 Public Health Emergency
Medicaid Section 1115 Demonstration
Final Evaluation Report
11/25/2025

Section A. Executive Summary

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 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.

During the ROP demonstration period, Colorado's Department of Health Care Policy and Financing (HCPF) was able to extend the ROP to 16,458 members who would have otherwise been terminated due to their unverified citizenship. 4,733 (29%) of these members were able to provide verification of their citizenship.

Section B. General Background Information

Colorado was approved on May 8, 2025 for Colorado's Reasonable Opportunity Period Extension COVID-19 Public Health Emergency Medicaid Section 1115 Demonstration covering June 23, 2023 to June 30, 2024. The ROP extension demonstration amendment assisted 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 have been possible for those whose declared U.S. citizenship status had not been verified or whose status was inconsistent with available data sources absent this demonstration. Furthermore, this demonstration amendment supported parity with existing policy that allowed the state to, through a state plan amendment, implement a good faith extension of the ROP for members who 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.

Section C. Evaluation Questions and Hypotheses

HCPF proposed 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 tested if the application of waiver 1115(a)(2) which allows members an additional opportunity to provide verification of their citizenship status increased member renewal compared to terminating for failing to provide verification during the PHE.

The following research questions and associated hypotheses were utilized 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 D. Methodology

The evaluation of this ROP demonstration is only assessing post-demonstration data for the cohort of members impacted by the criteria of the demonstration. Due to the nature

of the Public Health Emergency and the goals of this specific demonstration, there will not be any comparison groups outside of the cohort. The cohort consists of the original 16,458 members who were identified as of May 31, 2023 as individuals who were locked into Continuous Coverage but did not have verified citizenship status and required a Verification Check List (VCL) to be sent to request citizenship verification. Data on which members would be included in the cohort was initially collected in May 2023 and the results for the members of that cohort were measured over the 12 months of the unwind period from June 2023 to June 2024 based on the hypotheses and research questions put forth in Section C of this document. The measures being used to evaluate the demonstration were outlined in Section C and the Medicaid Operations Office is the steward of these measures. All data was obtained from the Colorado Benefits Management System (CBMS) and was checked for validity by ensuring there were no duplicate members. Due to the nature of the hypotheses and research questions, no advanced analytic methods were required to analyze the outcomes for the cohort.

Section E. Methodological Limitations

This approach has 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 that would create similar circumstances requiring the use of this approach previously where outcomes could be compared. 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 these possible outcomes, the population that was assessed may be skewed as terminations may be due to reasons outside of the verification of citizenship status.

Utilizing an interview-based methodology for assessing the challenges faced by the demonstration project, the action taken and results of those actions may result in biased and inconsistent responses. Due to turnover of key staff, it may also lead to fewer available staff at the time of evaluation who could knowledgeably speak regarding the demonstration.

Section F. Results

HCPF approached this Evaluation design through a mix of qualitative and quantitative analytic approaches and was able to obtain the necessary data to answer the research questions. Detailed results as well as the original hypotheses, research questions, and measures are provided in *Table 1* below.

Table 1:

Hypothesis & Evaluation Question Results			
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**
Question 1: Were members notified by Verification Checklist (VCL) that verification of their citizenship was required?	Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: ● Were sent a VCL	Colorado Benefit Management System (CBMS)	Descriptive
RESULTS:	16,458 members who had previously been locked into continuous coverage were sent a VCL due to having attested to their citizenship status, which could not be verified.	Colorado Benefit Management System (CBMS)	Descriptive
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**
Question 2: Were members maintained in their current aid code until their citizenship was verified, eligibility was determined, or the ROP demonstration was completed	Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: ● Maintained coverage during the ROP	Colorado Benefit Management System (CBMS)	Descriptive
RESULTS:	16,458 members who had previously been locked into continuous coverage	Colorado Benefit Management	Descriptive

	maintained coverage during the ROP due to having attested to their citizenship status, which could not be verified.	System (CBMS)	
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**
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?	Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: ● Were unable to verify their citizenship and had an eligibility determination completed based on this result.	Colorado Benefit Management System (CBMS)	Descriptive
RESULTS:	11,725 (71%) members were unable to verify their citizenship and had an eligibility determination completed based on this result.	Colorado Benefit Management System (CBMS)	Descriptive
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?	Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: ● Had their citizenship status verified	Colorado Benefit Management System (CBMS) Interview feedback from	Descriptive

	Analysis of the outcomes for the population	key eligibility staff	
RESULTS:	4,733 members were able to verify their citizenship and had an eligibility determination completed based on this result. This accounts for 29% of the total number of members who were locked into continuous coverage who had attested to their citizenship status which could not be verified. ● See *Chart 1* for the analysis of the outcomes for members in this cohort who continued their coverage. ● See *Chart 2* for the analysis of the outcomes for members who were terminated.	Colorado Benefit Management System (CBMS)	Descriptive
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	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	Interview feedback from key eligibility staff	Descriptive

implementation of the ROP demonstration and to what extent were they successful?	these actions.		
RESULTS:	See *Results Summary 1* for more details about the results of this measure.	Interview feedback from key eligibility staff	Descriptive

Chart 1:

Of the 4,733 members who were able to verify their citizenship status, 2,442 (52%) received coverage after their renewal was completed during Unwind. 80% of those that received coverage after their renewal was completed remained in the same benefit category, 13% moved to a higher benefit category and 7% moved to a lower benefit category.

Member Outcomes	Number of Members	Percentage of All Verified
Moved to a Higher Benefit Category	323	13%
Moved to a Lower Benefit Category	162	7%
Remained in the Same Benefit Category	1,957	80%
Grand Total	**2,442**	**52%**

Chart 2:

Of the 4,733 members who were able to verify their citizenship status, 2291 (48%) did not receive coverage after their renewal was completed during Unwind. 62% of these members were terminated due to procedural reasons, while 37% were terminated due to non-procedural reasons.

Termination Reason	Number of Members	Percentage of Those Verified & Terminated
Non-Procedural Terminations	**865**	**37.76%**
Other Non-Procedural	468	20.43%
Countable Income Above Allowable Limit	253	11.04%
Individual Not Living In The Home	60	2.62%
Not Eligible For Any Program	59	2.58%
Not A Co Resident	19	0.83%
Individual Has Died	6	0.26%
Procedural Terminations	**1,426**	**62.24%**
Failure To Complete The Renewal Process	763	33.30%
Failed to Provide Verification	491	21.43%
Whereabouts Unknown	103	4.50%
Ineligible Because Did Not Apply	41	1.79%
Failed To Provide Verification At Renewal	24	1.05%
Other Procedural Reasons	4	0.17%
Grand Total	**2,291**	**100.00%**

Results Summary 1:

Key eligibility staff were interviewed and provided the following details regarding the challenges related to implementation, the actions taken to address challenges and the results of those actions.

What were the principal challenges from the perspective of the state Medicaid agency?
During the Public Health Emergency (PHE), individuals who attested to eligible U.S. citizenship status were granted continuous Medicaid coverage, even in cases where their citizenship could not be verified at the time or where discrepancies existed between their declared status and available data sources. Following the end of the PHE, the state implemented the Reasonable Opportunity Period (ROP) Extension under the COVID-19 Public Health Emergency Medicaid Section 1115 Demonstration to prevent inappropriate terminations of coverage. This allowed individuals additional time to provide outstanding verification before their cases could be closed.

The primary challenges in administering the waiver included:

- **Identifying impacted individuals:** It was complex and time-consuming to accurately identify those whose citizenship status required additional verification post-PHE.
- **Member outreach and verification collection:** Engaging with affected individuals and successfully collecting the necessary documentation to verify their status proved challenging, especially in cases involving limited contact information or barriers to communication.
- **Administrative and resource burden:** Preparing the required documentation and navigating the federal approval process for the Section 1115 demonstration involved significant state resources and time, placing an additional strain on program administration during an already demanding unwinding period.

What actions did HCPF take to address challenges presented by the implementation of the ROP demonstration?
To address the challenges associated with implementing the Reasonable Opportunity Period (ROP) Extension Demonstration, HCPF undertook several key actions to ensure the effective identification and engagement of impacted individuals and to support timely processing of outstanding verifications.

One of the primary actions was the implementation of an eligibility system enhancement to generate and send formal requests for information (RFIs) to members identified as requiring citizenship verification. This system update allowed the state to efficiently initiate communication with affected individuals, informing them of the need to provide documentation and outlining steps for compliance within the extended ROP timeframe.

In addition to system changes, the state:

- **Leveraged existing data sources and analytics** to identify individuals whose

citizenship status was unverified or inconsistent, ensuring targeted outreach.
- **Coordinated member communication efforts** to improve understanding of verification requirements, including clear instructions and multilingual support where appropriate.
- **Provided assistance to members** through call centers, eligibility workers, and community-based organizations to help individuals navigate the documentation process and remove barriers to compliance.
- **Monitored and adjusted workflows** as needed to support timely processing and minimize the risk of inappropriate terminations.

These actions helped the state to operationalize the ROP extension effectively while maintaining continuity of coverage for eligible individuals during the post-PHE unwinding period.

To what extent were the actions that were taken successful?
HCPF successfully implemented system changes to identify and notify individuals with discrepancies related to their declared U.S. citizenship status. These enhancements enabled timely issuance of Requests for Information (RFIs) to impacted members, providing clear guidance on the documentation needed to verify their status during the extended Reasonable Opportunity Period (ROP).

Returned verifications were reviewed and processed in accordance with federal and state eligibility rules, and appropriate eligibility determinations were made based on the documentation received. These actions helped prevent unnecessary terminations of coverage and supported continuity of care for individuals making a good faith effort to comply with verification requirements.

While some challenges remained in reaching all impacted individuals—particularly those with outdated or incomplete contact information—the overall implementation of the ROP demonstration amendment enabled the state to uphold its commitment to program integrity while minimizing disruptions in coverage during the unwinding period.

Section G. Conclusions

During this period from June 2023 to June 2024 members who were able to provide citizenship verification had similar retention rates as the overall member population, however the entire cohort of members who were impacted by the ROP saw a much lower retention rate. The general member population, including those that were impacted by this ROP, had an average retention rate of 52%. Of the full 16,458 member population impacted by the ROP, 15% were retained in coverage, but of the 4,733 members who were able to provide verification of their citizenship 52% retained coverage.

During this period from June 2023 to June 2024 members who were able to provide citizenship verification had a slightly lower rate of procedural terminations than the overall member population, however the entire cohort of members who were impacted by the ROP saw a much higher rate of procedural terminations. The general member population, including those that were impacted by this ROP, had an average procedural termination rate of 26%, which was 64% of those that were terminated. Of the full 16,458 member population impacted by the ROP, 9,242 (56%) were terminated due to procedural reasons which was much higher than the general population's average rate of 26%. Of the 2,291 members who were able to provide verification of their citizenship, but were still terminated, 1,426 (62%) were terminated due to procedural reasons which was slightly lower than the general population's average rate of 64%.

11,725 members' citizenship could not be verified even with the ROP demonstration, leading to varying results for these members but still in line with the general population. 3,909 (33%) were terminated for non-procedural reasons while 7,816 (66%) were terminated due to procedural reasons. However, when reviewing the specific procedural reasons for termination, failure to complete the renewal process accounted for 46% of the procedural terminations for this group and only 33% of the procedural terminations for those members who were able to verify their citizenship.

The primary goal of this demonstration was to reduce inappropriate procedural terminations among a specific cohort of members who had attested to satisfactory citizenship status that could not be verified, but due to the Public Health Emergency they were locked in to Continuous Coverage. The demonstration did show that 4,733 (29%) members were able to verify their citizenship status with the addition of a Reasonable Opportunity Period in which to obtain and provide verification of their citizenship and once they were able to provide verification of their citizenship, they were slightly less likely to be terminated from coverage due to procedural reasons than the general population. As a result, this was successful in reducing inappropriate procedural terminations for those members of the cohort.

Section H. Interpretations, and Policy Implications and Interactions with Other State Initiatives

Taken together, the results indicate the demonstration achieved its narrow aim of preserving coverage while citizenship verification was pursued and that members who completed verification experienced outcomes broadly consistent with the overall population. Elevated procedural terminations within the full cohort suggest that barriers beyond citizenship verification persisted during unwind. The results outlined in this report indicate that going forward Medicaid programs should continue to focus long term goals of reducing procedural terminations by increasing the efficiency and effectiveness of ex parte renewals and simplifying the process of returning verifications.

In support of that goal the state has implemented and continues to plan projects that increase the ex parte rate and simplify member communications. Between July 2024, after this demonstration completed, and June 2025 Colorado maintained an average ex parte rate of 56.5% which was over the national average of 55.5%, an average retention rate of 76.9% which was over the national average of 74.3%, and an average procedural termination rate of 10.3% which was slightly lower than the national average of 10.5%[1]. In planning future projects, state Medicaid programs can provide reasonable opportunity periods for returning documentation in addition to working towards improving overall ex parte renewal processing and reducing procedural terminations which will improve retention rates for individuals who are eligible for coverage.

Colorado's experience suggests that a narrowly scoped, time-limited Reasonable Opportunity Period, paired with clear communications, ex parte maximization, and simple verification channels can reduce inappropriate procedural losses without compromising program integrity. States can include this as a standard element in unwind/contingency playbooks and evaluate success via transparent, cohort-specific metrics.

Section I. Lessons Learned and Recommendations

Due to the nature of this demonstration being related to a Public Health Emergency, the lessons learned and recommendations are necessarily limited in scope. This demonstration did allow some members to maintain coverage and avoid an inappropriate procedural termination. Colorado would recommend that other states implement a similar approach as reducing unnecessary procedural terminations provides value to the members who are able to maintain coverage as well as to eligibility technicians in reducing administrative workload.

Section J. Attachment(s)

The following attachments were included as appendices to this report:

- CMS-Approved Evaluation Design

[1] Centers for Medicare & Medicaid Services. (2025, September 26). June 2025: Medicaid and CHIP eligibility operations and enrollment snapshot. https://www.medicaid.gov/resources-for-states/downloads/eligib-oper-and-enrol-snap-june2025.pdf

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**

Question 1: Were members notified by Verification Checklist (VCL) that verification of their citizenship was required?	• Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: ○ Were sent a VCL	Colorado Benefit Management System (CBMS)	Descriptive
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**
Question 2: Were members maintained in their current aid code until their citizenship was verified, eligibility was determined, or the ROP demonstration was completed	• Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: Maintained coverage during the ROP	Colorado Benefit Management System (CBMS)	Descriptive
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**
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?	• Number of members who attested to their citizenship status, which could not be verified and were locked into Continuous Coverage who: Were unable to verify their citizenship and had an eligibility determination completed based on this result.	Colorado Benefit Management System (CBMS)	Descriptive
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?	• 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: ○ Had their citizenship status verified ● 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?	● 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 l **due 180 days after Demonstration approval*
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 **due 15 months after beginning of state's unwinding period on April 1, 2023*
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)