

*This series of reports analyzes enrollment changes in Health First Colorado (Colorado’s Medicaid Program) and Child Health Plan Plus (CHP+) and identifies factors that may have contributed to an increase or decrease in enrollment. The data source used is the Colorado Department of Health Care Policy and Financing’s [Premiums, Expenditures and Caseload Reports](#) in which monthly data represents caseload numbers at the end of that respective month. Previous enrollment analyses can be found [here](#).*

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### What Impacted Enrollment in Q2?

Overall, enrollment Health First Colorado (Colorado’s Medicaid Program) increased significantly while enrollment in Child Health Plan Plus (CHP+) decreased slightly. There are several possible factors driving these changes:

#### Impacts of Federal COVID-19 Legislation and Rules

On March 11, 2020, the U.S. Congress passed the Families First Coronavirus Response (FFCRA). FFCRA established an enhanced 6.2 percent federal funding match for state Medicaid programs and outlined certain requirements that states must abide by to receive this funding for the duration of the public health emergency (PHE). In accepting the funding, states agreed to abide by the following:

- Not terminate Medicaid members who were enrolled on or after March 18, 2020, unless the member voluntarily terminates their benefits, moves out of state, becomes incarcerated, or dies. This is typically called the Continuous Eligibility (CE) requirement and is mandated through the end of the month the PHE ends.
- Maintain eligibility standards that are “no more restrictive than what the state had in place as of January 1, 2020.” For example, a state cannot create additional verification requirements as those requirements can often cause a burden on members and restrict eligible residents from accessing services. This is typically called the maintenance of effort requirement and is mandated through the end of the calendar quarter when the PHE ends.
- Not charge members higher premiums than what was in place on January 1, 2020. This is mandated through the end of the calendar quarter when the PHE ends.
- Cover COVID-19 testing, services, and treatments without cost-sharing. This is mandated through the end of the calendar quarter when the PHE ends.

In addition to Health First Colorado members, the Colorado Department of Health Care Policy and Financing (HCPF) decided to apply the CE requirement to CHP+ members as well, with the exception of pregnant adults after 60-days postpartum and children turning 19 years old. It is also probable that some children transitioned from CHP+ to Health First Colorado as their family’s income decreased. Both the transition to Health First Colorado and exceptions to the CE likely account for the decrease in CHP+ caseload in Q2.

The CE requirements of FFCRA caused very few Health First Colorado, and likely fewer than average CHP+, members to lose coverage during Q2 of 2020. HCPF reports that 49,116 in

April, 50,916 in May, and 38,963 in June Health First Colorado and CHP+ members would have been disenrolled if not for the CE requirement.<sup>1</sup>

In addition, due to the CE requirement, HCPF did not disenroll the group of 35,000 members who were correctly determined ineligible in the Colorado Benefits Management System (CBMS), but not in interChange, the provider billing portal. This group was scheduled to be disenrolled on March 31, 2020, and is expected to be disenrolled once the lock-in coverage is no longer in effect.

### Increase in Eligible Coloradans Due to Rise in Unemployment

Due to the economic impacts of COVID-19, between roughly April through June (measured by the week ending on April 4 and June 27), 345,624 Coloradans filed initial claims for regular unemployment insurance. An additional 127,489 Coloradans filed for Pandemic Unemployment Assistance from its start in April through the end of June.<sup>2</sup> Additionally, many Coloradans experienced a decrease in hours due to COVID-19. This may have caused many Coloradans to lose their employer-sponsored insurance and regular income, and likely became newly eligible for Health First Colorado and CHP+

While not all families filing for unemployment will be eligible for Health First Colorado or CHP+, this rise in unemployment has likely increased the number of Coloradans eligible for these programs.

### Change in Application Assistance

During this quarter, most organizations that offer application assistance for Health First Colorado and CHP+ did not offer in-person application assistance, due to social distancing requirements. While many sites transitioned to remote assistance, it took time for organizations to make this process operational. Assistance sites had to navigate the need to offer remote enrollment assistance to keep both the client and assister safe as well as meet the state's requirements for a 'wet signature.' A 'wet signature' is one written directly in ink by the applicant and does not include scanned copies or pictures of signatures. To accommodate these requirements, some sites set up drop boxes for clients to leave their signed application or a drive-by set up in which a client came by the site only for the purpose of signing the application. In addition, during this time, most County Human Services Departments were closed to in-person assistance.

Other possible reasons for the caseload include:

- Anecdotal reports suggest confusion among what income is countable for Health First Colorado and CHP+, particularly if the baseline unemployment insurance (UI) payments and enhanced UI are both countable. As both UIs are considered as income for the Supplemental Nutrition Assistance Program (SNAP), Colorado's Food Assistance program, it is possible that some eligible Coloradans may have thought that this income makes them ineligible for Medical Assistance programs as well.

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<sup>1</sup> Colorado Department of Health Care Policy and Financing Discussion with Providers, July 16, 2020 <https://www.colorado.gov/pacific/sites/default/files/Provider%20Leader%20Presentation%20-%20July%2016%2C%202020.pdf>

<sup>2</sup> [Regular UI Weekly Continued Claims by County](#) [PUA Weekly Initial Claims by County](#)

- Children often enroll in Medical Assistance following a physician's visit. However, due to COVID-19, there was a large decrease in outpatient physician visits.<sup>3</sup>

Overall, the increase in Health First Colorado and CHP+ caseload can be attributed to the maintenance of coverage through continuous eligibility for almost all existing members and an increase in eligibility among Coloradans who were previously not eligible.

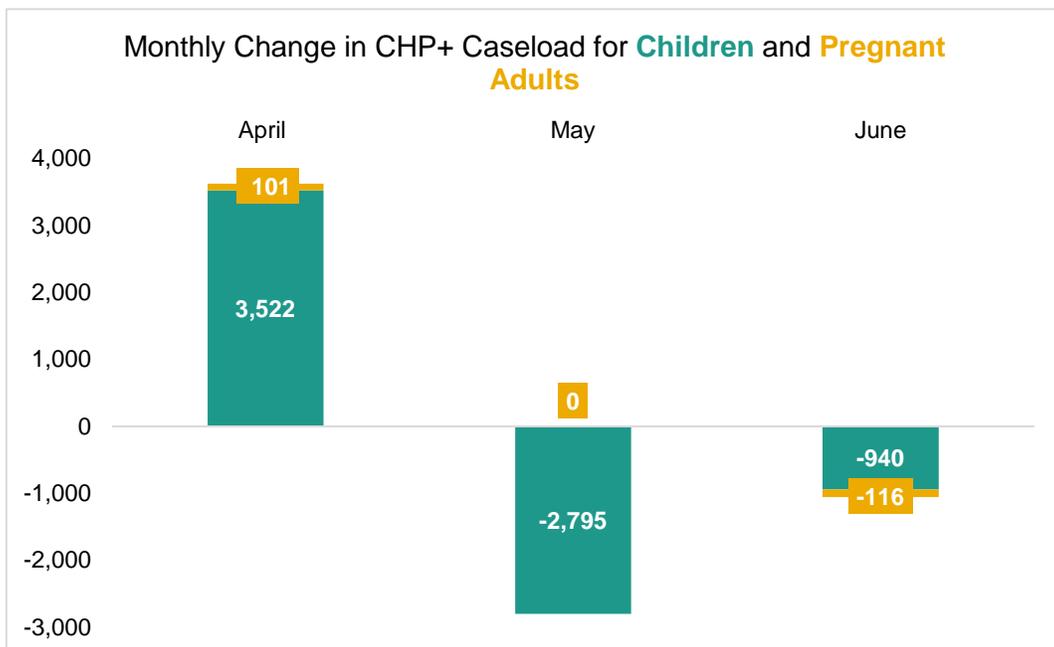
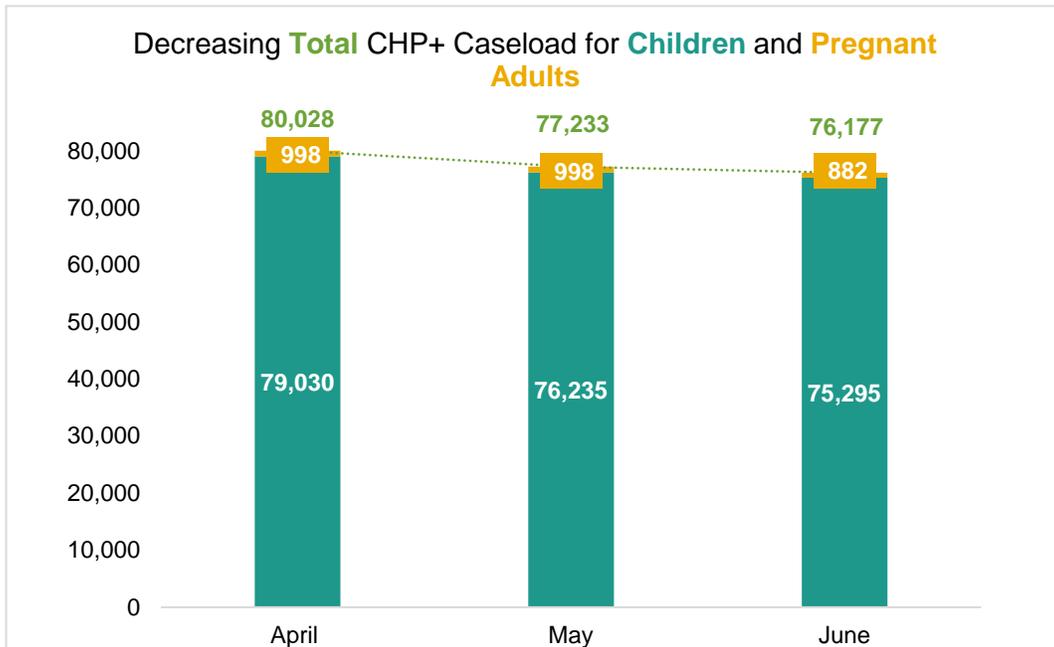
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<sup>3</sup> The Impact of the COVID-19 Pandemic on Outpatient Visits: A Rebound, Emerges, May, 19, 2020  
<https://www.commonwealthfund.org/publications/2020/apr/impact-covid-19-outpatient-visits>

## CHP+ Enrollment Data

The total number of children and pregnant adults enrolled in CHP+ **decreased by 228 or 0.3 percent** from the beginning of April to the end of June 2020. The caseload increased significantly in April and then decreased in May and June, bringing the caseload back to that at the end of March.

- Children's enrollment **decreased by 213 or 0.3 percent** with a large increase in April and decreases in May and June.
- Pregnant adults' enrollment **decreased by 15 or 2.7 percent**.

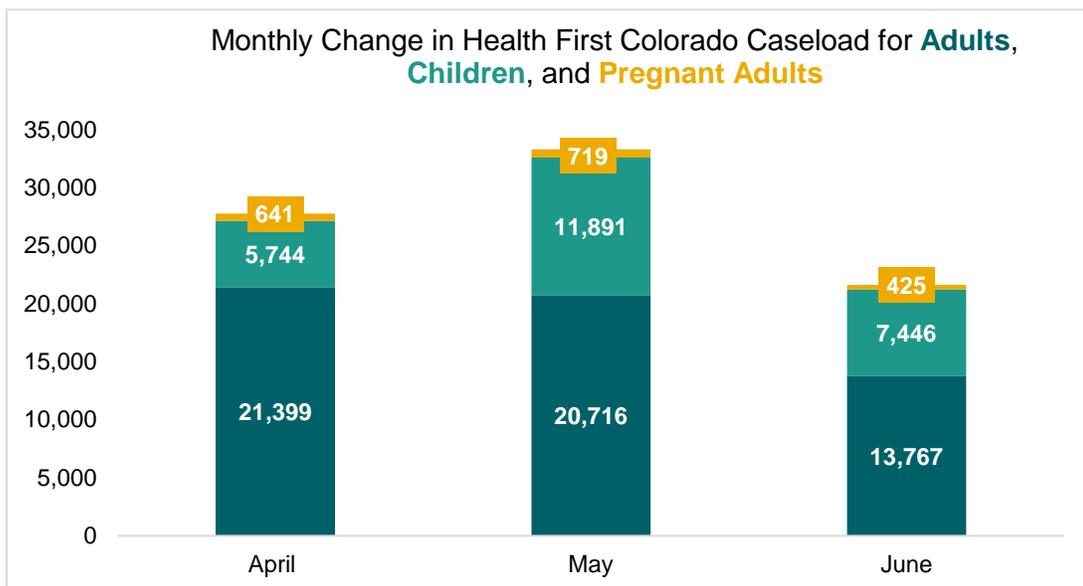
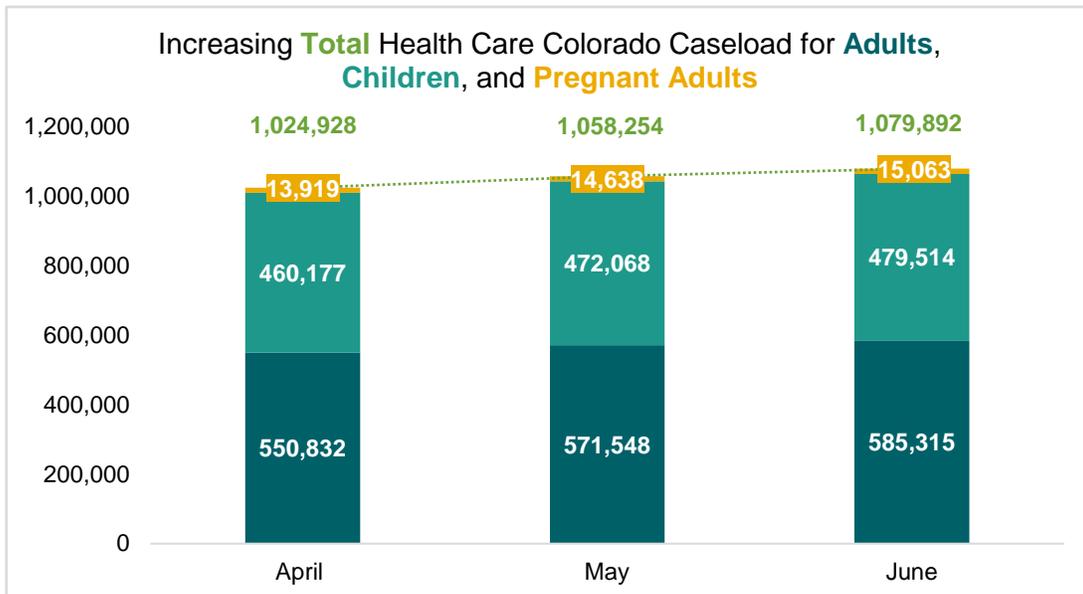


## Health First Colorado Enrollment Data

The total number of people enrolled in all Health First Colorado programs **increased by 87,818 or 7.4 percent** from the beginning of April to the end of June 2020.

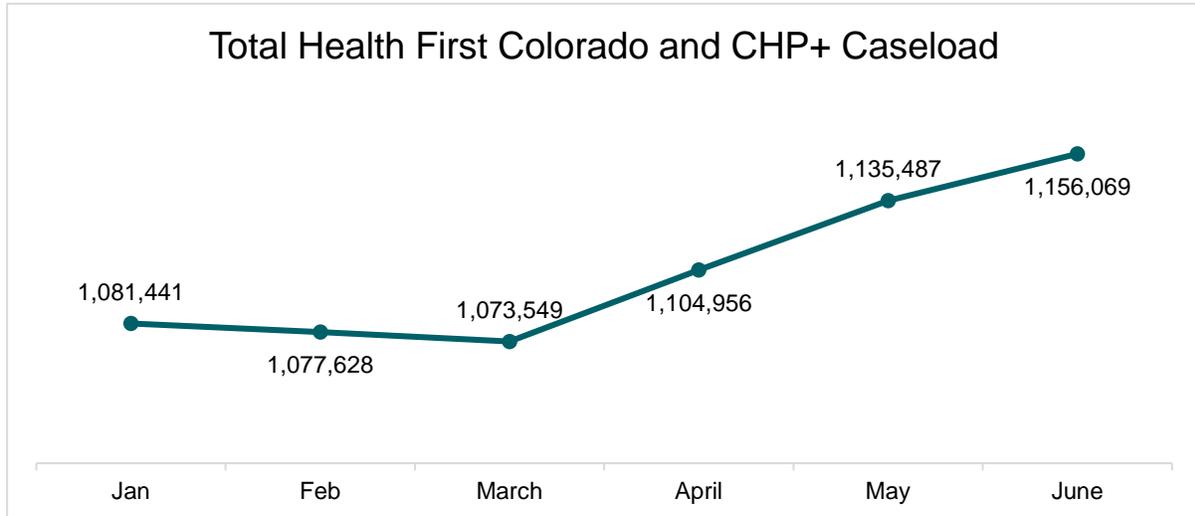
The total number of adults, pregnant adults, and children enrolled in non-disability programs (i.e. Modified Adjusted Gross Income, or MAGI programs) for Health First Colorado **increased by 82,748 or 8.3 percent** from the beginning of April to the end of June 2020

- Adult enrollment **increased by 55,882 or 10.6 percent** with increases in each month.
- Pregnant adult enrollment **increased by 1,785 or 13.4 percent** with increases in each month.
- Children's enrollment **increased by 25,081 or 5.5 percent** with increases in each month and the largest increase in May.



## Enrollment Trends

The total number of people enrolled in Health First Colorado MAGI programs and CHP+ programs **increased by 82,520 or 7.7 percent** from the beginning of April to end of June 2020.



The following chart displays the change in enrollment in Q2 across the last three years. program.

	<b>Health First Colorado</b>	<b>CHP+</b>	<b>Total</b>
<b>Q2 2018</b>	↓ 2,490 ↓ 0.2%	↓ 2,258 ↓ 2.7%	↓ 4,748 ↓ 0.3%
<b>Q2 2019</b>	↓ 15,031 ↓ 1.4%	↓ 1,744 ↓ 2.1%	↓ 16,775 ↓ 1.5%
<b>Q2 2020</b>	↑ 82,748 ↑ 8.3%	↓ 228 ↓ 0.3%	↑ 82,520 ↑ 7.7%

## Looking Forward

In the future, we anticipate a steady increase in enrollment followed by a steep decrease when the CE requirement ends at the end of the month when the PHE ends. It is expected that the PHE will end on October 22, 2020, and that the CE requirements will end on October 31, 2020. At that time, HCPF will reassess the eligibility of all members and disenroll those who are no longer eligible, projected at roughly 250,000 members.