



COVID-19 Public Health Emergency

What is the public health emergency?

The public health emergency (PHE) is an emergency declared by the Secretary of the Department of Health and Human Services (HHS) in the event of “a) a disease or disorder presents a public health emergency (PHE); or b) that a public health emergency, including significant outbreaks of infectious disease or bioterrorist attacks, otherwise exists.”¹ PHE declarations last for 90 days and may be extended by HHS.

What is the timeline of the PHE?

HHS first declared the PHE on January 27, 2020, and has renewed it seven times. The current PHE is set to expire on January 16, 2022.

What is the impact of the PHE on Health First Colorado and CHP+?

During the PHE, states can receive an enhanced 6.2 percent federal funding match (called FMAP) for its state Medicaid program. This is funding from the Families First Coronavirus Response Act (FFCRA) and comes with certain requirements states must abide by to receive the money.

For Health First Colorado (Colorado’s Medicaid Program), the Colorado Department of Health Care Policy and Financing (HCPF), Colorado’s Medicaid agency, must:

Requirement	Example	Timeline
Continuous Eligibility: Not terminate members who were enrolled on or after March 18, 2020, unless the member voluntarily terminates eligibility or moves out of state.	A member received a pay raise in June that would otherwise make them ineligible for Health First Colorado. Due to the continuous eligibility requirement, HCPF cannot terminate that member’s coverage during this time, despite their current ineligibility due to income.	Through the end of the month when the PHE ends. Current: January 30, 2022
Maintenance of Effort: Maintain eligibility standards that are “no more restrictive than what the state had in place as of January 1, 2020”	HCPF cannot enact additional verification policies for Health First Colorado members during this time but could ease the verification requirements.	Through the end of the calendar quarter when the PHE ends. Current: March 31, 2022
Not charge higher premiums than were in place on January 1, 2020	HCPF cannot enact an increase in Health First Colorado premiums during this time, including the decrease in adult dental coverage, from \$1,500 to \$1,000.	
Cover COVID-19 testing, services, and treatments without cost-sharing	HCPF cannot require a member to pay a co-pay for COVID-19 testing, services, or treatment.	

HCPF also applied the above policies to Child Health Plan *Plus* (CHP+) members, except for children turning 19 and pregnant adults 60-days postpartum.

For more information about COVID-19 policies, see CKF’s [COVID-19 Policy and Program Updates for Health Coverage Programs](#).

¹ <https://www.phe.gov/Preparedness/legal/Pages/phedeclaration.aspx>
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